



November 16, 2017

United States Environmental Protection Agency

Via [www.grants.gov](http://www.grants.gov)

RE: EPA FY18 Brownfields Cleanup Grant

Dear Grant Review Committee:

The Onondaga County Industrial Development Agency (OCIDA) appreciates the opportunity to submit the enclosed proposal for a \$200,000 Cleanup Grant Application for the former Roth Steel, Inc. property—located at 800 Hiawatha Boulevard West in Syracuse, NY.

While OCIDA covers all 19 town and 15 villages within Onondaga County, the economic engine for the County is undoubtedly the City of Syracuse, located at the figurative and geographic center of the County. However, even with all of this economic opportunity in our region, Syracuse is home to our greatest social and environmental challenges. The practice of “redlining” led to segregated neighborhoods concentrating minority populations into the poorest Census tracts in the country. The site is located in a prime location to positively impact many of these poor racially divided census tracts by reducing exposure to harmful toxins, increasing urban green space and providing paths for safe egress between our City and suburban towns.

The Site, a bankrupted scrap steel recycling facility, is contaminated with polychlorinated biphenyls (PCBs), heavy metals, various dioxins and petroleum contaminants. Due to the pervasive contamination on the Site, private developers refused to bid on the property during bankruptcy due to the potential for massive looming liability in cleanup. When OCIDA learned that another scrap metal facility was going to purchase the property, the Agency stepped in and purchased the property from the bankruptcy trustee with the intent of finding a higher and better use. OCIDA would like to see the property returned to a productive use that is safer for human health and better complements the remediated Superfund Site of Onondaga Lake than a “pick and pull” scrap yard.

OCIDA plans to use its resources of payments in lieu of tax (PILOT) to help make the property more attractive for developers or public entities with use that is safe for human health and safe for the environment. We are requesting the support of the United States Environmental Protection Agency (EPA) to help our local agencies off-set the costs associated with assessment of the Site, which was left from a bankrupted contaminator. This project would benefit one of the poorest areas within our region, which is also one of the neediest areas in the country, through decreased exposure to harmful toxins, increased opportunity for safe bicycle and pedestrian access, and increased quality of life through increased green space.

This grant would greatly benefit our County and specifically the City of Syracuse as we continue to work to alleviate the historic environmental injustice which has plagued our community.

Included below is the specific information request in the proposal guidelines:

- a. Applicant: Onondaga County Industrial Development Agency, 333 W. Washington Street, Suite 130; DUNS: 079577021
- b. Funding Requested:
  - i) Grant Type: Single Site Cleanup
  - ii) Federal Funds Requested: \$200,000
  - iii) Contamination: Hazardous Substances
- c. Location: City of Syracuse, Onondaga County, New York
- d. Property Information: Roth Steel Inc., 800 Hiawatha Boulevard West, Syracuse NY
- e. Contacts
  - i) Project Director Isabelle Harris, Economic Development Specialist, Onondaga County Industrial Development Agency, 333 W. Washington Street, Suite 130, Syracuse, NY 13202. Tel: (315) 435-3770, E-mail: iharris@ongov.net
  - ii) Chief Executive/Highest Ranking Elected Official: Joanne Mahoney, County Executive, 421 Montgomery Street, 14<sup>th</sup> Floor, Syracuse NY 13202. Tel: (315) 435-3516, Fax: (315) 435-8582, E-mail: JoanneMahoney@ongov.net
- f. Population
  - i) General Population 144,142 (City of Syracuse, 2014 Census)
  - ii) Target Area Population 5,438 (2014 Onondaga County Community Benchmark Report)
  - iii) Affirmation of Persistent Poverty: Our jurisdiction is currently experiencing “persistent poverty” with more than 20% of our population living in poverty over the past 30 years.
- g. Regional Priorities Form/Other Factors Checklist: Attached to this Cover Letter.
- h. Letter from the State Authority: Attached to this Cover Letter.
- i. Date Submitted
- j. Project Period: October 2017 – September 2020.

We thank you in advance for considering our grant application. If you have any questions or require clarification on elements in this proposal, please call our Project Director at (315) 435-3770. We look forward to the possibility of working together in the future.

Sincerely,  
Onondaga County Industrial Development Agency

Isabelle Harris  
Economic Development Specialist

## Cleanup Other Factors Checklist

Name of Applicant: Onondaga County Industrial Development Agency

Other Factor	Page #
None of the Other Factors are applicable.	
Community population is 10,000 or less.	1
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 200 decennial censuses and the most recent Small Area Income and Poverty Estimates.	1
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	9 & attachments regarding OCIDA's agreement to fund the project.
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Bureau of Program Management  
625 Broadway, 12th Floor, Albany, NY 12233-7012  
P: (518) 402-9764 | F: (518) 402-9722  
[www.dec.ny.gov](http://www.dec.ny.gov)

Ms. Joanne Mahoney  
County Executive  
Onondaga County  
421 Montgomery Street, 14<sup>th</sup> Floor  
Syracuse, NY 13202

OCT 16 2017

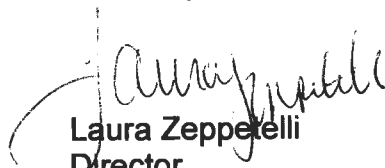
Dear Ms. Mahoney:

This is to acknowledge that the New York State Department of Environmental Conservation (Department) received a request dated October 5, 2017 for a state acknowledgement letter for United States Environmental Protection Agency (USEPA) Brownfield grant.

I understand that the Onondaga County Office of Environment will be applying on behalf of the Onondaga County Industrial Development Agency for a Brownfield Cleanup application in the amount of \$200,000. Funding will be utilized for hazardous substances at the former Roth Steel property at 800 Hiawatha Boulevard, in Syracuse. The project is focused on the removal and remediation of two automotive shredder residue waste cells which are buried in the portion of the site where the County's Loop the Lake trail will eventually be placed.

The Department encourages initiatives to redevelop brownfields with the goal of mitigating any environmental and health impacts that they might pose.

Sincerely,



Laura Zeppetelli  
Director  
Bureau of Program Management

ec: T. Wesley, USEPA Region 2  
S. Edwards/H. Warner, NYSDEC  
H. Granat, Onondaga County



NEW YORK  
STATE OF  
OPPORTUNITY

Department of  
Environmental  
Conservation



## 1. **COMMUNITY NEED**

### 1a. **Target Area and Brownfields**

#### 1.a.i. Community and Target Area Descriptions

Syracuse is known as “Salt City” from its days of supplying most of the state, including New York City, with salt between 1850 and 1920. In addition to an early industrial boom in salt production, industry also included pottery and candle making. The construction of the Erie Canal was crucial to the development of Syracuse as a major commercial center, bringing in companies like Carrier Corporation, Rockwell International, Crouse-Hinds, and General Electric. Companies located adjacent to Onondaga Lake utilizing it for their production processes, often disposed of production waste in and around the lake. These activities persisted until the 1950s, when many industries, associated with the production of typewriters, soda ash, lead works, and pharmaceuticals, closed due to innovations in technology and new understanding of environmental health hazards. This left huge swaths of land contaminated around Onondaga Lake and its vicinity.

The City’s population declined as the move to the suburbs began in earnest. High property taxes in New York State (NYS) created an inhospitable business environment in Syracuse, which caused many businesses, such as General Electric and Carrier Corporation, to relocate their headquarters out of state. This shifted the City of Syracuse’s labor force from mostly manufacturing-based to predominately service-based, leaving contaminated industrial former manufacturing sites vacant. The City of Syracuse completed a Brownfield Opportunity Area Nomination Study in 2014 for the Hiawatha-Lodi Section of the City (adjacent to, but not including the Site). According to the US Census report *Counties with Statistically Significant Change in Poverty Rate 2007-2015*, Onondaga County experienced an increase in poverty between these years, and City of Syracuse experiences “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years.

The **Target Area** contains a mix of industrial and residential properties that make up the City of Syracuse’s Near-West Side. Historically, this area was the site of Onondaga Lake resorts between the 1880s and early 1920s, until Allied Signal began burying soda ash waste from its industrial processes along the southern and western shoreline. Industrial businesses moved into the **Target Area** in the 1960s and 70s because the land was already degraded and inexpensive, and they continued to emit pollution into the ground and waters of Onondaga Lake. The environmental stresses of the **Target Area** have impacted the surrounding neighborhoods and left citizens concerned about the effects of this historical legacy of pollution. We propose to perform cleanup activities in the northwestern portion of the Site, which contains two automotive shredder residue waste cells. This portion of the Site is adjacent to Onondaga Lake, and contains PCB-laden material. The proposed cleanup will address hot spots on Site and eliminate offsite migration of contaminants into the adjacent neighborhoods of the City’s Near West Side.

#### 1.a.ii. Demographic Information and Indicators of Need

Table 1	13204 Target Area	City of Syracuse	New York State	National
Population:	5,438 <sup>5</sup>	144,142 <sup>4</sup>	19,795,791 <sup>6</sup>	314,107,084 <sup>1</sup>
Unemployment:	17% <sup>7</sup>	5.3% <sup>6</sup>	5.7% <sup>6</sup>	5.0% <sup>2</sup>
Poverty Rate:	53% <sup>4</sup>	35.1% <sup>5</sup>	15.4% <sup>6</sup>	15.6% <sup>3</sup>
Percent Minority:	50% <sup>4</sup>	44% <sup>6</sup>	29.9% <sup>6</sup>	37.2% <sup>1</sup>
Median Household Income	\$14,437 <sup>7</sup>	\$22,901 <sup>6</sup>	\$58,687 <sup>6</sup>	\$54,482 <sup>3</sup>
Total Number of Property Vacancies	1,152 <sup>5</sup>	1,899 <sup>5</sup>	16,000 <sup>6</sup>	18,600,000 <sup>3</sup>
Percent of Population Foreign Born	12% <sup>4</sup>	11% <sup>4</sup>	22.3% <sup>6</sup>	13.1% <sup>6</sup>
Percent of Population with a Disability	31% <sup>4</sup>	29.9% <sup>6</sup>	13.9% <sup>3</sup>	19% <sup>3</sup>
Percentage of Households with Housing Cost Burdens*	68% <sup>4</sup>	--	--	48% <sup>1</sup>
Percentage of Owner Occupied Households	34% (1,927 homes) <sup>7</sup>	38.5% <sup>6</sup>	54.2% <sup>6</sup>	64.4% <sup>3</sup>

*Onondaga County Industrial Development Agency – Site Specific Cleanup Grant – FY 18*

City of Syracuse Taxes Owed to Onondaga County (2014)	\$6,097,920 (31%) <sup>5</sup>	\$19,484,497 <sup>5</sup>	--	--
Tax Delinquent Properties	2,071 (38%) <sup>5</sup>	5,385 <sup>5</sup>	--	--
<sup>1</sup> 2014 American Community Survey data profile and are available on American FactFinder <sup>2</sup> Bureau of Labor Statistics (The Employment Situation – March 2016) <sup>3</sup> 2014 American Community Survey data profile and are available on American FactFinder <sup>4</sup> 2014 Mapping Economic, Educational & Housing and Neighborhood Opportunity in Onondaga County & Syracuse, NY <sup>5</sup> Housing in Syracuse and Onondaga County 2014 Community Benchmark Program Report				

**1.a.iii. Description of the Former Roth Steel Brownfield Site**

The Site is 24 acres located along the southern shore of Onondaga Lake in an urban area north of the intersection of Hiawatha Boulevard with State Fair Boulevard. It is currently vacant and is zoned as an industrial district. The Site operated as a metal processing and recycling center from the 1950s up until 2014. Suburban sprawl and changing industry caused a major shift from the City to neighboring towns and villages, forcing poor and minority communities to reside in close proximity (the **Target Area**) to these contaminated properties, such as the former Roth Steel facility (the Site), which is adjacent to Onondaga Lake. Residents here have been exposed to these industrial legacies for decades.

The **Target Area** is a location of extreme poverty (income below \$23,000), especially among African American and Hispanic populations. According to the American Community Survey (2015), one out of every two children within the City of Syracuse is poor; that totals to an estimated 16,600 children, which is 46.9% of all the City's children. The rate of families in poverty within the City was about 26.6% in 2013, and total poverty was about 33.2% in 2013. Between 2008 and 2012, Syracuse reported a four-year high for its poverty rate and unemployment rate (Wogan, 2013). The vulnerable populations within the **Target Area** include foreign-born residents, disabled populations, and those with housing cost burdens. The redevelopment of the Target Area has been slowed due to lingering industrial pollution problems

**i. Brownfields and Their Impacts**

The lakefront Site operated as a metal processing and recycling center from the 1950s up until 2014. Pollutants located at the Site include high concentrations of polychlorinated biphenyls (PCBs), volatile and semi-volatile organic compounds (VOCs and SVOCs), metals, glycols, cadmium and lead. Other prior uses that led to site contamination include the storage and shredding of vehicles, wastes from industrial processes for the production of soda ash, and other scrap materials; onsite disposal of Auto Shredder Residue (ASR) in two underground cells; and unregulated discharges of storm water. The Site was previously investigated under a Consent Order between Roth Steel and the New York Department of Environmental Conservation (NYSDEC). Roth declared bankruptcy and closed the facility in 2014. Onondaga County Industrial Development Agency (OCIDA) purchased the Site from the bankruptcy trustee in 2015. The Site is located in an industrial and commercial area on the southern end of Onondaga Lake and is zoned as an industrial district.

The Site is located on the southern edge of Onondaga Lake, where several other brownfields and Superfund sites are located. There are 12 such sites throughout the City associated with the overall Onondaga Lake Superfund Site, which include: the Onondaga Lake Bottom; Geddes Brook/Ninemile Creek; Willis Avenue; LCP Bridge Street-Operable Unit 1; Wastebed B/Harbor Brook; Semet Tar Beds; Town of Salina Landfill; Lower Ley Creek; Ley Creek PCB Dredging; General Motors—Inland Fisher Guide; National Grid—Hiawatha Boulevard; and Wastebeds 1-8. These sites are known to have released and potentially released mercury, PCBs, pesticides, creosotes, heavy metals (including lead, cobalt and mercury), polycyclic aromatic hydrocarbons (PAHs) and VOCs, such as chlorobenzene.

There are other brownfields in the vicinity, including the following:

- *Smith and Caffrey Steel* (2625 Lodi St.) is a former foundry and may have released solvents from residual steel cutting oil.
- *Superior Lubricants* (2713 Lodi St.) is a registered petroleum bulk storage facility that has withheld information from public records.
- *Seitz Oil* (2717 Lodi St.) operated from at least 1930-1962 and distilled oil from crude. A large fire in 1962 destroyed the facility and there were apparent spills during the fire.
- *Quanta Resources* (2802-2810 Lodi, 103 Wolf) is a Class 2 Inactive Hazardous Waste Site, regulated through NYS Superfund program. Former waste oil recycling facility in operation from 1929-1981.
- *Greyhound Garage and Body Shop* (701 Hiawatha Blvd.) five underground storage tanks were removed; a reported petroleum tank failure occurred in 1988.
- *Penman-Littlehales Chemical Co.* (418 Hiawatha Blvd.) manufactured potash, aqua ammonia, and Prussian blue, which leaked into the surrounding area.

The Site is near adjacent residential neighborhoods that are approximately 2,000 ft. away. Those neighborhoods have a poverty rate nearly three times that of the National average (please refer to the Demographics table above) and would benefit from the revitalization of this brownfield site. OCIDA purchased the Site to avoid another scrap metal facility from occupying lakefront property. However, because of the high potential cleanup liability (estimated to be several million dollars for the entire Site) the Site should be partially cleaned to reduce the future burden and risk to a developer.

#### **a. Welfare, Environmental, and Public Health Impacts**

##### **i. Welfare Impacts**

Within the City, there are approximately 1,800 vacant, non-seizable properties, meaning no property owner currently exists. These properties do not generate vital revenue to local government. According to the City of Syracuse Vacant Property Registry, to live next to a vacant property is often times like living next to a breeding ground for nuisance and crime. Vacant structures impact the value of nearby property.

Vacant properties cause neighborhoods to decline, and this has wide-ranging effects on residents, including children and student populations. According to the *Syracuse City School District Transformation through Collaboration Report from May 2012*, 96% of students are in underperforming schools, and only 51% of high school students graduate on time. Communities outside the **Target Area**, such as neighboring zip code 13214, have better educational opportunities: the graduation rate from high school in this area was 95.5% in 2013, according to Open Data Network. Between 2008 and 2012, Syracuse reported a four-year high for its poverty rate and unemployment rate, which was especially apparent in the Target Area, where the poverty and unemployment rates were three times the national average at 53% and 17%, respectively (Wogan, 2013). City and County efforts have been focused on increasing employment and offering services for those in severe need. The median household income for 13214 (the larger Syracuse area?) was \$62,386, compared to the median income of \$14,437 in the **Target Area**. Communities without brownfield or pollution issues appear to fare much better than those such as the **Target Area**, which are inundated with underutilized, abandoned projects that often have environmental concerns.

According to City of Syracuse crime reports, crime incidence is higher in the **Target Area**. According to City Data, the violent crime (murder, non-negligent manslaughter, forcible rape, robbery, and aggravated assault) rate in 2016 in Syracuse was 436.5 incidences compared to the U.S. average of 202.6. About 80% of those incidences took place in the **Target Area**. The violent crime rate in the City on a scale of 1 (low crime) to 100 (high), is 77, according to *Sperling's Best Places*. The **Target Area** has a rating of 90 on this violent crime scale. Both of these rating are significantly higher than the national average of 31.1. This could be

considered both a direct and indirect impact of brownfields. The Site has previously experienced issues with vagrant and criminal populations, and part of the IRM in place was to fence in the entire property to secure it. Syracuse is the fifth largest city in NYS, but ranks 8 in the state for violent crimes per 1,000 residents according to 2013 FBI statistics. These crime numbers demonstrate the other factors holding these impoverished communities' hostage to locational variables that make it difficult for them to get out of poverty or overcome violence and health threats. Vacant brownfields contribute indirectly to crime by lowering property values in surrounding areas and creating vulnerabilities to surrounding residents.

The construction of Interstate 81 (I-81) (discussed below) caused major barriers to development for these neighborhoods. Through the redlining caused by I-81, residents are cut off from grocery stores, retail areas, parks, and Onondaga Lake itself. The **Target Area** received a D rating, which is considered "least desirable" and "declining" neighborhoods, and were not eligible for federally backed mortgages. The level of safe walkability around I-81 is low. According to the *Onondaga Lake Rehabilitation Guidance: The 2020 Vision Report*, many community members would like to see downtown Syracuse connected to the lake, the Loop-the-Lake Trail and lakeshore activities by a system of trails to downtown, thus greatly improving access to the lake. I-81 is a major barrier for connection, and a number of brownfield sites, like the ones mentioned above, sit around this interstate system. Impoverished neighborhoods and high crime rates tend to concentrate in areas surrounding I-81.

ii. Cumulative Environmental Issues

In addition to the environmental stress of brownfields and Superfund sites, the community is exposed to the following:

- Reporting to EPA within the **Target Area**: Onondaga Lake Superfund National Priorities Listing, PolyPure Inc. (RCRA Corrective Action), Quanta Resources Site (RCRA Corrective Action) (Exposure Routes: Former and current Air, Water, Petroleum, Lead, Hazardous Wastes).
- The *Onondaga County Metropolitan Wastewater Treatment Plant* ( 650 Hiawatha Blvd. W., Syracuse NY 13204) emits odor, noise, and stormwater runoff into Onondaga Lake (Exposure Routes: Air, Water).
- The *CSX Railroad Tracks* that run through the Site have a medium rail traffic volume and emit noise, air, dust, spill pollution, etc. (Exposure Routes: Air, Noise, Water).
- *Midland Sewage Treatment Plant* (Southside neighborhood of Syracuse NY) displaced 35 African-American families when it was built; causes air pollution, loss of landscape/aesthetic degradation, biodiversity loss (wildlife, agro-diversity), waste overflow, surface water pollution/decreasing water (physico-chemical, biological) quality, groundwater pollution or depletion (Exposure Routes: Air, Water).
- The *Centro Bus Garage* emits noise pollution, air pollutants from buses, and heavy traffic (Exposure Routes: Air, Noise).
- *Hiawatha Boulevard* is home to a number of the Onondaga Lake Superfund subsites, and a number of brownfields next to the Onondaga County Metro Wastewater Treatment Plant (Exposure Routes: Air, Water, Skin).
- *Onondaga County Resource Recovery Agency Waste to Energy Facility* emits air pollution by incinerating trash; this is in operation because Cortland County has a landfill that is running a deficit (Exposure Route: Air).
- *Tully Valley Mudboils*, a hydrogeologic phenomenon, cause significant amounts of sediment to Onondaga Creek and Onondaga Lake, causing a major decrease in native fish populations. This influences the turbidity of Onondaga Lake, another factor considered in the Superfund requirements (Exposure Routes: Air, Skin, Water).
- *Interstate 81 (I-81)* (discussed above) caused major barriers to development in these neighborhoods since its construction in 1957, and its impacts are discussed in section 1.b.i (Exposure Route: Air).

iii. Cumulative Public Health Impacts

The brownfields and other sources of pollution have contaminants that are potentially harmful to human health. The Site has high concentrations of PCBs from its decades as a scrap metal recycling facility. PCBs cause both acute and chronic health issues such as disrupted reproductive function, neurobehavioral and developmental deficits, thyroid hormone toxicity, liver damage, increased serum levels of hepatic enzymes, and cancer, as discovered through research from Onondaga Community College and the NYS Department of Environmental Conservation. Specifically, elevated PCB concentrations have been found in sections of the automotive shredder residue cells located on the northwest side of the Site. In three separate borings, PCBs have been found at 96.9ppm, 173ppm and 304ppm. Exposure levels are higher in the **Target Area** because of this prevalence.

Due to a historic prevalence of health concerns stemming from PCBs and mercury, Onondaga County Department of Health is currently conducting a study of these pollutants in local immigrant populations throughout the City of Syracuse and will monitor the effects of fish consumption. Great numbers of Burmese, Bhutanese, Nepali, and Somali populations fish the waters of Onondaga Lake and are potentially exposed to these toxins through consumption of fish and contact with the shoreline area. These populations access the shores through these Southern end sites (such as the former Roth Steel property) to fish for sustenance. New American populations may not have the economic stability to shop the local supermarket for their food, or have the transportation to get there; therefore, many rely on the Lake.

Lead contamination in the **Target Area** is of major concern to public health officials. Exposure to lead can come from in-home sources, such as pipes and paint, public spaces such as schools and municipal facilities, or from contaminated environments like the brownfields noted above. Syracuse had the nation's highest percentage of children with lead poisoning between 2009 and 2015, according to a study published in the Journal of Pediatrics. The **Target Area** and downtown Syracuse are widely considered as the epicenter of lead poisoning in the City by local health officials. A study completed by Quest Diagnostics in Syracuse found that lead poisoning can cause lower IQs, long-lasting brain damage, and many other health concerns. The study mentioned above found that 40% of Syracuse children had blood lead levels between 5 and 10 micrograms per deciliter, while 16% had levels exceeding 10 micrograms per deciliter.

The infant mortality rate is 7.1 in Onondaga County, which is significantly higher than the NYS average rate of 5.3, with mortality significantly higher for blacks versus whites. A suspected cause for this is the increased exposure to toxins caused by the higher rate of blacks living in vulnerable, poverty-stricken areas, which may also contain contaminated properties. The infant mortality rate in the City of Syracuse is approximately 9.5 deaths per 1,000 live births as of 2016. This is compared to greater Onondaga County, with an infant mortality rate of 6.2 deaths per 1,000 live births in 2016. The **Target Area**, found within the City of Syracuse, has a significantly higher risk of birth-related impacts to undue environmental and financial burdens.

Hunger also plagues the City of Syracuse, with approximately 17,908 individuals with unmet food needs according to the Syracuse Hunger Project. The need lies most heavily within the Northside, Near-West and Southside communities, including the **Target Area**, which is exacerbated by brownfield presence, as described above. According to the US Department of Agriculture, the **Target Area** is both a "Low Income" and "Low Access" to supermarkets tract, indicating a food desert. The Southside and Downtown areas of the City represent the greatest need, with a heavy concentration of low income, high density population and extremely low access to supermarkets with and without a vehicle. The isolating nature of vacant brownfields both reduce access and keep income low as residents without vehicles cannot get out of their immediate neighborhoods to find work or food. Brownfield presence also represents the inability to cultivate and capture

**b. Financial Need**

i. Economic Conditions

The City of Syracuse budget for 2017 included an \$18.5M deficit, with approximately half of the city's properties not on the tax roll to produce property tax revenue. OCIDA has a budget of over \$1 billion that is directly tied to purchasing brownfield property and redeveloping with PILOT agreements. OCIDA purchased the property because of the City's financial struggles in recent years and the possibility of another scrap metal facility taking over the Site. Industrial decline in the City and **Target Area** hit an all-time high since the 1970s after the 2008 recession hit and companies began leaving the area because of high property tax rates, and limited tax revenue. The City has yet to rebound economically, and has struggled to balance issues as loss of businesses, and vacancy of commercial and industrial properties while running at a deficit. Vacant brownfield sites are not producing taxes for the City or County, and are avoided by developers because of the costs associated with remediation. The City and County's budget situation has been affected by the shift of higher-earning residents to the suburbs. The amount of taxes owed to Onondaga County (Table 1), and tax delinquent property data demonstrate that the ability to pay taxes is associated with the general ability of the municipality to seek out and provide basic resources for residents, and the ability of those residents to find or afford those resources. Higher numbers of tax delinquent properties and taxes owed demonstrates an area of economic and resource struggle within the City of Syracuse. Residents who can no longer work in the City are fleeing to the suburbs and leaving poverty-stricken communities to fend for themselves because of their inability to afford to move. According to *The Central New York Fetal-Infant Mortality/Morbidity Review*, Syracuse has the second-highest child poverty rate in the US for Hispanics and the worst rate in NYS for blacks. The challenging economic outlook persists today—the following sectors lost jobs in 2017: 1,900 in business professional services, 1,400 in education-health services, 700 in natural resources-mining-construction, and 100 each in financial activities and in other services, indicating a loss of the jobs that replaced industrial jobs, and signaling a downward spiral in the overall jobs outlook for the City. (Syracuse.com).

ii. Economic Effects of Brownfields

According to City of Syracuse Data, the brownfields in Syracuse place a huge burden on City services, including: public safety (fire and police departments), health (air and water pollution), public works (trash, maintenance), and economic development (lack of incentives for developers to purchase contaminated sites). As these brownfields sit, they do not produce property taxes and represent lost tax revenue for the City of Syracuse.

Combined, the brownfields sites mentioned in 1.a.iii. account for approximately 70-90 acres, and 25% of the developable property in the **Target Area**. The opportunity cost of these vacant properties, compared to an industrial or commercial site, are \$6,868/acre/year (\$~500,000 per year) in property taxes and 20-40 employees per acre, based on the estimated square footage allowed on these sites under current zoning. Area businesses have stated that brownfields act as a barrier for development, which stunts growth and prevents adjacent properties from reaching their full economic potential. For instance, several sites have leveraged financial incentives to invest in cleanups and new facilities. As reported by the New York State Tax Department, private developers invested a total of \$41.5 million -- \$10.7 million in cleanup costs and \$30.8 million in new construction -- on six brownfield sites in the Syracuse area from 2007 to 2012. The benefits of remediating brownfield areas are realized through business re-investment and economic revitalization for the greater Central NY area.

## **2 PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **a Project Description, Timing, and Implementation**

#### **i. Existing Conditions**

The Site area is approximately 24 acres in size, at the southern end of Onondaga Lake, and is bounded by: CSX Railroad Tracks to the northwest; the Metropolitan Wastewater Treatment Plant owned by Onondaga County to the north/northeast; Hiawatha Boulevard West to the east/southeast; and approximately 13 industrial businesses along State Fair Boulevard to the southwest. Most of the Site is designated as Operable Unit 1 (OU1), comprised of about 22.75 acres. The OU2 portion of the Site is a 1.25-acre linear strip of land located along the northeast perimeter of the property. It includes the Canalways Trail that will be primarily constructed “at grade.” The western section of the trail within OU2 will become elevated as the trail transitions to an overhead pedestrian bridge.

The Site includes two automotive shredder residue (ASR) disposal cells located on the northwest side of the Site. Elevated PCB concentrations have been found in sections of these waste cells. A former storm water pond (lagoon) also exists in the central portion of the Site. Soil surrounding the pond has been impacted by ASR materials and it is likely that pond sediment is also impacted. ASR waste and fill materials generally exist throughout much of the Site. In total, 56 drums of “auto waste” liquids were removed, including the three that were classified as hazardous waste. Removal also included 11 drums of drill cuttings, 7 rainwater drums, three 250 gallon totes of drilling fluid (one of which was hazardous waste), one drum of DECON water, one drum of mineral spirits, the capacitor/asbestos materials, one drum of PPE, and one lab pack of aerosol cans/paint. Additional removal of ASR has also been completed by OCIDA. Between February 20<sup>th</sup> and March 7<sup>th</sup>, 2017, Neu-velle, LLC, with JMT oversight, removed ASR Waste Pile 1 and 2 from the Site.

Currently the Site is vacant and primarily enclosed with a locked security fence. Six buildings remain on site; however, OCIDA anticipates releasing a Request for Proposals to take these down in spring of 2018 (this action is not related to this grant application). Vehicle access along Hiawatha Boulevard West is restricted by a locked gate.

#### **ii. Proposed Cleanup Plan**

This funding will help supplement cleanup efforts on behalf of the Onondaga County Industrial Development Agency (OCIDA), who have already developed an Interim Remedial Measure (IRM) Work Plan for this property. This request for EPA funding addresses the portion of the Site where the two automotive shredder residue (ASR) cells are buried and where the County’s Loop the Lake trail footprint will exist. This trail will continue over the existing CSX railroad to utilize existing infrastructure, while creating a multi-modal transportation crossing that allows the CSX Railroad Tracks to remain. The proposed cleanup plan activities will protect both workers and trail users from exposure to Site contaminants by removing soil hot spots in the two waste cells, capping other areas, and using deed restrictions and fencing to restrict Site use.

The Plan proposes to complete hot spot removal of the two ASR waste cells on the northwest side of the Site (OU2) and/or provide 1-foot of approved soil as a cap along the Trail in the elevated portion of the Trail where it rises over the ASR Disposal Cells. The installation of bridge footings will be necessary for portions of the Trail. In order to prevent direct exposure to soil, this NYSDEC/USEPA-approved plan has been developed to excavate around each proposed bridge footing prior to the start of construction. Removed material will be categorized as hazardous waste if PCBs are 50 ppm or greater and will be taken to a hazardous waste landfill. PCBs less than 50 ppm will be taken to a non-hazardous waste landfill.

The “at grade” portion of the trail will be constructed with a 10-ft. wide asphalt surface. Consistent with 6 NYCRR Part 375-3.8, an asphalt surface will satisfy the NYSDEC capping requirements for a Track 4 restricted commercial-use remedy. A new fence will also be installed at the southern and western edges of the

trail. This fence will restrict access between trail and other portions of the Site. Additionally, a chain-link fence already exists on the north edge of the trail separating the former Roth Steel Site from the Onondaga County Municipal Waste Water Treatment Plant. The area between the asphalt walking trail and the fence-lines will have a 1 ft. compacted soil cover to prevent potential pedestrian exposure. This proposed remedy, along with deed restrictions (that will be established), is consistent with a NYSDEC Track 4 commercial-use (“passive” recreational) cleanup. It also satisfies the USEPA Self-Implementing PCB cleanup requirements for a low occupancy area. USEPA and NYSDEC have both approved of this remedy.

iii. Alignment with Revitalization Plans

The goal for cleanup is to remediate the northwest portion of the Site to standards that allow for passive recreation and public use. There is historical emphasis on creating a trail that loops the entirety of Onondaga Lake shoreline, and by removing hazardous hot spots on Site, the trail footprint will be able to pass the southern portion of shoreline. The entire Site cleanup is going to rely on a phased approach, since the Site has been divided into two operable units. This funding is aimed at the portion of the trail to be designated as passive recreational to keep in line with the vision for Onondaga Lake and the surrounding communities. It will be the first time the City of Syracuse residents on the Near-West and South sides have direct lake access via a trail, that will also connect them to features along the remainder of the Loop the Lake Trail.

The Site cleanup and future use will align with the following County and City plans and initiatives:

- The *Onondaga Lake Trail Extension Project* of Onondaga County Departments of Transportation and Parks will extend the trail through the Site, over CSX railroad, and connect to the City of Syracuse Creek Walk trail. A portion of the site will feature recreational green space for some of the City's poorest census tracts. The site will also become an entry point to the lakefront for communities that have not had those opportunities previously.
- *County Sustainability Plan* calls for the existing structure of the CSX railroad to be used as a multi-modal transportation crossing, with the proposed Lake Extension Trail continuing over the railroad to enable community connections by utilizing existing transportation methods, open up new corridors of transportation and connection through the extension of our lake trail.
- The *City of Syracuse Comprehensive Plan 2040* Land Use & Development section seeks to preserve and enhance Syracuse's existing land use patterns while promoting environmentally sustainable land use patterns, transportation options, and site plans. This project is consistent with the Plan.
- The *Comprehensive Economic Development Strategy for Central New York (state)* includes long-range actions to improve area services and public facilities to retain existing businesses and attract new companies to the region, which this grant will do with the brownfield sites listed above.

The cleanup of the northwest side of the Site and construction of the trail will develop safe, reliable and sustainable transportation choices, target federal funding toward existing low-income communities through mixed-use development and land recycling, and enhance the unique characteristics of the **Target Area**. This will be an investment in healthy, safe, and walkable urban neighborhoods connecting to local environmental assets like Onondaga Lake, which will mitigate potential environmental justice concerns by providing more transportation choices, supporting existing communities, and valuing existing community and neighborhood structure in future planning. There are few, if any, existing pedestrian connections between the City and the Lake, and this project will help improve the quality of life for residents near the Site. Existing infrastructure, such as the CSX railroad that crosses the Site, and the County's Wastewater Treatment Plant, will remain intact and any Site developments will take advantage of infrastructure location. The County's trail will utilize a natural footprint between existing infrastructures and allow multimodal transportation throughout the site. A portion of the site (along Hiawatha Blvd.) will be used for commercial development. Businesses will attract visitors from the Destiny USA property adjacent to the Roth Steel site.

All Site redevelopment will include a reduction of PCB and other contaminants to appropriate levels, as



Onondaga County Industrial Development Agency – Site Specific Cleanup Grant – FY 18 regulated by USEPA and NYSDEC. Currently, there is no public access to the site. After full site redevelopment, the site will reenter the tax base and will be utilized by the public using existing transportation infrastructure, as well as a newly developed section of the County's Loop the Lake Trail. For every dollar spent on brownfields assessment and cleanup, approximately 2.5 dollars will be created in private sector investment, as discussed above.

## **b. Task Descriptions and Budget Table**

### **i. Task Descriptions**

#### *Task 1: Community Outreach*

OCIDA will implement a Citizen's Participation Plan to keep area citizens and local governmental officials informed about planned and completed activities at the site. The community outreach will include distribution of fact sheets, web site postings, establishment of a document repository, notifications to local media outlets and governmental officials, and public meetings at key points in cleanup with our supporting organizations (FOCUS Greater Syracuse, Northside Urban Partnership and the Onondaga Lake Conservation Corps. It will be particularly important to seek public input in evaluating potential re-use options for the property. The output of this task is a Citizen's Participation Plan.

The cost breakdown is as follows: 120 Staff Hours via Supporting Agencies x \$125/hour = \$15,000 In-Kind + \$5,000 Fringe + \$2,000 Printing and Distribution Supplies + \$8,000 Consulting Assistance to Guide Public Outreach = **\$30,000**

#### *Task 2: Hazardous Soil Excavation and Disposal*

In order to reduce the potential health risks to workers constructing the Trailway, Alternative #2 proposes to conduct hot spot removal and/or provide 1-foot of approved soil as a cap along the Trail in the elevated portion of the Trail where it rises over the ASR Disposal Cells. The installation of bridge footings will be necessary for portions of the Trail. Therefore, workers would be directly exposed to contaminated soil. In order to prevent direct exposure, an approved plan has been developed to excavate around each proposed bridge footing prior to the start of construction. Removed material will be categorized as hazardous waste if PCBs are 50 ppm or greater and will be taken to a hazardous waste landfill. PCBs less than 50 ppm will be taken to a non-hazardous waste landfill. This proposed remedy is consistent with a NYSDEC Track 4 commercial-use ("passive" recreational) cleanup. It also satisfies the USEPA Self-Implementing PCB cleanup requirements for a low occupancy area. USEPA and NYSDEC have approved of this remedy.

An additional component for the remedy that has not yet been approved by DEC/EPA addresses the elevated section of the trail that crosses over the ASR Disposal Cells. A potential remedy for this area includes "hot spot" removal where PCBs are 50 ppm or greater followed by a 1 ft. soil cover over both ASR Disposal Cells. The excavated soils will be disposed of as hazardous waste at an offsite landfill. This cleanup plan would require future approval by NYSDEC and USEPA.

The cost breakdown is as follows: Transportation/Disposal Fees: \$210 per cubic yards \* 800 cubic yards = \$168,000 + \$2,000 Printing & Distribution Supplies = \$170,000

#### *Cost Share (20%)*

The cost share will include remaining work from the Remediation Task Alternative #2 presented in the ABCA. These funds will provide a portion of money necessary to complete a 3-acre cover with 1 ft. of soil on the Site. OCIDA will provide the funding for the cost share, as demonstrated in the attached letter. The cost share will cover approximately 22% of the cost for the 3-acre cover. The remaining work to complete the remediation task will be paid for through OCIDA, as demonstrated in the Ability to Leverage section.

The cost breakdown is as follows: \$40,000 (OCIDA general funds allocated by the OCIDA board to pay for a portion—approximately 22%—of the costs necessary to provide a 3-acre cover with 1 ft. of soil for the Site. Please see attached letter regarding Cost Share and Ability to Leverage.

ii. Budget Table

<b>Budget – Hazardous Cleanup</b>	<b>Task 1</b>	<b>Task 2</b>	<b>Total</b>
<b>Personnel</b>	-	-	-
<b>Fringe Benefits</b>	-	-	-
<b>Travel</b>	-	-	-
<b>Supplies</b>	\$10,000	\$2,000	<b>\$12,000</b>
<b>Contractual (Engineering Consulting)</b>	\$20,000	\$168,000	<b>\$188,000</b>
<b>Cost Share</b>			<b>\$40,000</b>
<b>TOTAL BUDGET</b>	<b>\$30,000</b>	<b>\$170,000</b>	<b>\$240,000</b>

c. Ability to Leverage

OCIDA is able to create Payment in Lieu of taxes (PILOT) agreements for local developers, and will leverage these funds to complete the cleanup work at the former Roth Steel property. This Brownfield Cleanup Grant award will fund approximately 42% of the total project cost (\$478,000) for the Roth Steel Alternative #2 Remediation (as referenced in the Analysis of Brownfield Cleanup Alternatives). Task 1 will allocate \$30,000 of grant funding to community outreach and education during the cleanup process. Task 2 will allocate \$170,000 for hazardous soil excavation and disposal.

<b>Source</b>	<b>Purpose/Role</b>	<b>Amount (\$)</b>	<b>Status</b>
Onondaga County Industrial Development Agency	In-kind services to address remaining cleanup procedures listed in ABCA Alternative #2.	\$238,000	Secured Resource (see attached letter)
Local Developer	Funding to redevelop the Site.	~\$100,000	Potential Resource (with assistance of OCIDA PILOT agreements)
NYS Regional Economic Development Council Consolidated Funding Application – Waterfront Revitalization Grants*	Provide community consensus and provide a clear direction for appropriate future development.	~\$100,000-\$400,000	Potential Resource
National Grid Brownfield Redevelopment Grants*	Funds utility-related infrastructure improvements and other costs that are necessary to progress the redevelopment of a brownfield.	\$300,000	Potential Resource

\*While these funds are not yet committed to any one project, OCIDA and the City have a track record of leveraging these funds. One example is the National Grid Marketing Grant for Clean Energy that OCIDA managed in 2015, and the Community Development Block Grant managed by the City of Syracuse from 2014-2016.

3. **COMMUNITY ENGAGEMENT AND PARTNERSHIPS**

a. **Engaging the Community**

Three public outreach organizations have demonstrated their support for this grant proposal and have agreed to assist OCIDA in developing a community involvement plan. The plan will detail a schedule of public engagement throughout the entirety of the cleanup process through monthly update meetings held by each organization (FOCUS Greater Syracuse, Onondaga Lake Conservation Corps, and Northside Urban Partnership). At each monthly hearing, the public will evaluate criteria for the end use of the Site and what a local developer must adhere to in order to fulfill the remediation goals of nearby neighborhoods. The public will have the opportunity to guide the developer selection process and develop a community redevelopment

*Onondaga County Industrial Development Agency – Site Specific Cleanup Grant – FY 18*  
plan for the location in which the Site is located.

Tours of cleanup progress will be given to members of the public involved with our three supporting organizations. The surrounding neighborhoods will be encouraged to attend and participate in all planning discussions through an aggressive door-to-door outreach effort. Flyers of public meetings relating to Site cleanup will be handed out, and surveys will be produced electronically every month to solicit input on the cleanup procedures and the future use of the Site. We will allow the public to drive the future use of the Site and assist in all planning throughout the remediation process. These methods are best for the target community since this Site is close to two distinct neighborhoods, the Near-West and South side of Syracuse; therefore electronic and paper communication of public outreach efforts will be effective in reaching the widest range of nearby residents.

Concerns and disruptions during the cleanup and redevelopment of the Site will be handled during monthly public hearings held by OCIDA. Public concerns regarding health, safety, and community disruption during the cleanup process will be addressed during these monthly meetings, and considered throughout the duration of cleanup. OCIDA will do everything possible to protect sensitive populations, through the installation of vapor intrusion barriers, and implement any additional best management practices necessary to mitigate harmful exposure to adjacent residential populations. The board will welcome concerns and work with JMT to minimize health and safety hazards and secure all contaminants from migrating offsite.

*How OCIDA Will Communicate Progress with the Supporting Public Outreach Organizations:*

- The public outreach coordinator will be responsible for contacting community organizations with updates and information to spread out into the community. The coordinator will also be available for the public to email and call with questions. Open lines of communication between the County and the public during the cleanup will be crucial during this period. We will employ a variety of measures to keep the community aware of the cleanup activities on the Site. We will utilize the Onondaga County Public Library and the Onondaga County Office of Environment in the County Civic Center as repositories for all Site-related reports and updates.
- Content related to cleanup will be translated into multiple languages such as Mandarin, Bhutanese, Spanish, Chinese, etc. These methods have proven most effective in other redevelopment and remediation activities in the City.
- We will provide updates regarding the stages of the Site cleanup. For each completed milestone, we will update the public and accept feedback on the community's perceptions, questions, and concerns of progress we make, through public hearings held by our supporting organizations.

**b. Partnerships with Government Agencies**

*New York State Department of Environmental Conservation (NYSDEC)* works to conserve, improve and protect New York's natural resources and environment and to prevent, abate and control water, land, and air pollution, in order to enhance the health, safety and welfare of the people of the state and their overall economic and social well-being. NYDEC manages a statewide Brownfield Cleanup Program and regulations. NYSDEC will approve on all cleanup work plans for the Site, as well as oversee administration of proposed cleanup procedures.

The *Onondaga County Department of Health (DoH)* works to protect and improve the health of all Onondaga County residents. For this project, the DoH will provide environmental health reports and research on the Site, provide direct outreach to all Onondaga County residents regarding the cleanup of the site, and serve as a point of contact for citizens concerned about the contamination.

The New York State Department of Health protects, improves, and promotes the health, productivity and well-being of all New Yorkers. They will assist with public notifications on any potential health hazards during cleanup, or hazards for construction workers. We will contact the NYSDOH to ensure statewide health regulations are addressed during the cleanup procedures, and if any health concern/risk is exposed during the project, we will contact the department to send out a public.

The New York State Department of Labor protects workers, assists the unemployed, and connects job seekers to jobs. We will submit work plans to the NYSDOL to allow access to the drum area, and other hazardous areas, by trained and certified asbestos workers.

The New York State Department of State is a principal resource for New York local governments seeking training and technical assistance. We will refer to NYSDOS for help on administrative codes and planning.

*Other relevant federal, state, and local governmental agencies:* OCIDA will work with EPA on the Grant. The EPA Project Officer and Quality Assurance staff will be integral to ensure that the work is done appropriately. In addition, OCIDA will work with the Syracuse-Onondaga Planning Agency, and the Central New York Regional Development and Planning Board (CNYRPDB) on this project. CNYRPDB is our regional planning commission with extensive EPA funded Brownfields experience and will support OCIDA in a number of ways. They are retained to assist with the management of the grant to ensure compliance with all requirements, serve on the Brownfields Advisory Committee, and also assist OCIDA to find additional fund leveraging to complete the project. The City of Syracuse Industrial Development Agency will also support responsible development projects through funding or in-kind services as they can.

### c. Partnerships with Community Organizations

#### i. Community Organization Descriptions and Roles

Organization Name	Description	Confirmed Role
<b>Forging Our Community's United Strength (FOCUS) Greater Syracuse</b>	A community-wide visioning program created with the goal of making Syracuse a better place to live and work started by a group of Leadership Greater Syracuse graduates and interested residents. The program is loosely modeled after several visioning projects around the country, and came out of the desire to determine a course of action and growth for Syracuse.	Lead community outreach and information efforts for educating the public on cleanup efforts. Hold public forums to solicit comments on cleanup plans and determine whether cleanup effort meets goals and expectations.
<b>Northside Urban Partnership</b>	Seeks to radically improve the quality of life on the Northside of Syracuse by convening citizens, organizations, businesses and institutions to identify common interests and work towards tangible outcomes.	Public outreach and project updates at public meetings.
<b>Onondaga Lake Conservation Corps</b>	An organization of volunteers that contributes to restoration projects that create and improve wildlife habitat in the Onondaga Lake Watershed. The Corps inspires future stewards of Onondaga Lake and its watershed through a hands-on, experience-based program that offers citizens and organizations the opportunity to participate in activities that help restore and sustain Onondaga Lake and its value as an Important Bird Area.	They will assist with habitat restoration, and public outreach through volunteerism. The OLCC Community Outreach Coordinator will lead habitat restoration activities and education programs on the property during cleanup and after.

ii. Letters of Commitment

Letters of commitment affirming participation of each partner are found the attachment ‘**Support Letters.**’

**d. Partnerships with Workforce Development Programs**

We will work with Onondaga Earth Corps to involve local members of the South and Near-West side communities to volunteer at the former Roth Steel site to perform post-cleanup activities including tree planting, site design, planning, and construction. OEC engages youth and young adults in poor urban communities within the City of Syracuse to learn and become invested in environmental career tracks. Through investment in the local community for jobs centered on the Site, these citizens will begin to see themselves as catalysts of change for the City of Syracuse and promote a positive view of the future of our urban community. OCIDA is committed to include local hires in any contracts supplied by this grant, and focus on employment opportunities for local organizations and companies.

**4. PROJECT BENEFITS**

**a. Welfare, Environmental, and Public Health Benefits**

The project will mitigate the following impacts from the Site:

- Induce the redevelopment of vacant buildings on the Site and surrounding neighborhoods.
- Reduce crime through the securing of the Site and development of either commercial or park venues with adequate public safety measures (lighting, payphones, trails, etc.)
- Increase the access of park area for residents in the Near-West and Southside neighborhoods
- Increase sustainable transportation between various parts of the City through a Trail Extension over the Site.
- Mitigate stormwater runoff and spill pollution.
- Mitigate potential health consequences of PCB, VOC, SVOC, and heavy metal exposure.
- Improve health outcomes for sensitive populations by potentially improving access to food by safe pedestrian access to adjacent neighborhoods (pending future commercial development), and increasing areas for recreation.
- Decrease potential exposure to PCBs, VOCs, and heavy metals, such as lead and mercury.
- Decrease areas where vagrant populations may go to use drugs or abuse alcohol.

**b. Economic and Community Benefits**

- The redevelopment of the Site will reduce burden on the Syracuse City Police Department and the Syracuse Fire Department—these agencies will have lower incidences of vagrant populations at the site, or illegal activities near existing contamination once the site is assessed and cleaned.
- Business re-investment and economic revitalization for the greater Central NY area through private developers: as reported by the New York State Tax Department, private developers invested a total of \$41.5 million -- \$10.7 million in cleanup costs and \$30.8 million in new construction -- on six brownfield sites in the Syracuse area from 2007 to 2012.
- The redevelopment of the Site will potentially increase recreational space, which will bring more visitors and residents of the City to the lakeshore, providing a public benefit and open recreation area to connect to the Onondaga Lake Trailway System.
- The redevelopment of the Site will potentially increase commercial/industrial space, by 10 acres, which are estimated to increase tax revenue (property, tax, business license, etc.) by \$6,868/year, based on the estimated square footage allowed on these sites under current zoning.
- The redevelopment of the Site has the potential of providing 20-40 jobs per acre, which will reduce the unemployment and poverty rate, and increase business and payroll taxes, and other revenue.
- Increase taxable property by providing a space for developer purchase.

- Decrease tax delinquent property by seizure and remediation of abandoned property.
- Decrease barriers to business and commercial development, therefore increasing jobs for local residents.

## **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### **a. Audit Findings**

OCIDA affirms it has not received any adverse audit findings in managing grants and operations.

### **b. Programmatic Capability**

Julie Cerio is the Director of Economic Development for OCIDA and will oversee the management by OCIDA of the cleanup grant. Ms. Cerio has appointed Isabelle Harris to take the lead on the Roth Steel Property and work with the selected contractor to fulfill this cleanup grant. Isabelle Harris, Economic Development Specialist for OCIDA will oversee the cleanup work of consultants, headed by John Ciampa, Director of Environmental Remediation and Geophysical Services for JMT of New York, Inc. OCIDA selected JMT through an EPA-approved Request for Proposals process, and together prepared a work plan for the Site. Ms. Harris is a highly qualified economic development specialist with 10+ years of experience in communications and economic development for state and county government. She has worked as the Director of Intergovernmental Relations and the District Director for New York State Senator John A. DeFrancisco. Prior to her work in the Senator's Office, Ms. Harris worked as the Research and Communications Officer for Onondaga County Executive Joanne M. Mahoney. Mr. Ciampa brings considerable project management experience having worked for 32 years as a professional environmental scientist specializing in hydrogeology and geophysical applications.

Mr. Ciampa has extensive project management and professional experience serving both the public and private sectors. He has worked on a diverse range of environmental and geologic projects including hazardous waste remediation, hydrogeologic assessments, site evaluations, regulatory development, environmental permitting, and preparation of expert testimony. He has experience applying for and working within Superfund and Brownfields programs, and completing Site Characterization Plans, Remedial Investigations, Feasibility Studies, Alternatives Analysis Studies, and preparation of Remedial Action Work Plans.

Additional project support will be provided by: Yaicha Winters, a geologist for JMT whose related project experience includes Phase II Environmental Site Assessment and Remedial Investigation Work Plans, Environmental Services, and Article VII Application for a New 1000 MW Electrical Transmission Line; Frank Peduto, a former NYSDEC employee and current environmental engineer for JMT whose responsibilities as a Senior Environmental Engineer include certification of Spill Prevention Control and Countermeasure (SPCC) plans, Brownfields Coordinator, Solid Waste Permitting, Petroleum Bulk Audits and Compliance, and Petroleum and Hazardous Waste Investigation and Remediation; and Joseph Krikorian, an environmental scientist for JMT who has experience performing vapor intrusion studies and soil, water sampling, overseeing Membrane Interface Probe (MIP) investigation and geoprobe investigations, and developing Site Characterization (SC) Work Plans and Remedial Work (RW) Plans.

Administrative support will be provided by Travis Glazier, Director of the Onondaga County Office of Environment and Holly Granat, Project Coordinator for the Onondaga County Office of Environment. Mr. Glazier and Ms. Granat will assist Ms. Harris in the management of the grant activities and communication with JMT. Mr. Ciampa will be the direct contact for JMT, and the additional project support provided by Ms. Winters, Mr. Peduto, and Mr. Krikorian will fall under Mr. Ciampa's direction.

### **c. Measuring Environmental Results: Anticipated Outputs and Outcomes**

The outputs for the Roth BCP Project include: Citizen's Participation Plan, Remediation Investigation Report, Remedial Action Work Plan (RAWP), IRM Workplan, and Alternative Analysis Report (AAR). Detailed documentation of the site investigative activities will be maintained during the field activities. Reporting, including ACRES, will include discussions of findings and submission of a final written report, including all laboratory documentation to NYSDEC. Milestones will also be recorded and reported.

Anticipated outcomes for this project will be the determination of the extent of contamination at the site. After site cleanup, OCIDA will better understand the nature of future use for this brownfield site, and the acreage of the site possible for trail/park and commercial/business purposes. This site will increase Onondaga County Parks land by approximately 25% and provide residents of the Near-West and South Side communities as a lakefront recreational site. We recognize that this cleanup grant will not cover the entirety of expenses at the former Roth Steel property, but we know these funds will be a major first step (approximately 5% of the estimated total cost) in the reclamation of this land.

**d. Past Performance and Accomplishments**

**ii. OCIDA has not received an EPA Brownfields Grant but has received other federal or non-federal assistance agreements.**

(1) *OCIDA received a **National Grid Marketing Grant** in 2016 for \$40,000.*

Purpose and Accomplishments: The purpose of this grant is to support target industry analysis for business attraction marketing and sales purposes, support outreach initiatives towards industry trade groups, support the creation and distribution of industry-specific publications, profiles and studies, support early stage planning or feasibility studies that prepare assets to be marketed, such as economic development -mega sites, industrial parks, multi-use facilities and support for efforts to attract major tourism destination facilities including infrastructure assistance. Through this grant, OCIDA provided marketing outreach support to Air Innovations, Bitzer Scroll, Carrier, and O'Brien & Gere to promote clean energy upgrades and utility infrastructure to accommodate their expansion and provide 2 years of electric service demand charge discounts. Measures of success were noted as the expansion and ability to accomplish energy savings over the duration of the grant, which OCIDA fulfilled.

Compliance with Grant Requirements: OCIDA performed as a regional economic development agency and promoted clean energy savings and updated utility infrastructure to enhance the competitiveness of Upstate New York through financial offsets by assisting these companies expand their businesses to a tax-free zone in NYS. OCIDA also provided PILOT agreements between these companies and their appropriate payment-plan agency to ensure completion of the proposed projects. OCIDA provided National Grid with adequate reporting of milestones and timely completing of all grant activities.

(2) *OCIDA received a **NYS Combined Funding Application (CFA) Grant** in 2017 for \$682,673.*

This grant has not been executed yet, but must be used by OCIDA for one or more of the following: acquisition of land, buildings, machinery, and/or equipment; demolition and environmental remediation; new construction, renovation or leasehold improvements; acquisition of furniture and fixtures; soft costs of up to 25% of total project costs; and planning and feasibility studies related to a specific capital project or site. OCIDA will likely utilize this grant to acquire brownfield sites and work on securing an environmental engineering firm to perform necessary cleanup procedures to prepare the site for redevelopment.

Additionally, PILOT agreements are an effective means by which OCIDA is able to facilitate the redevelopment of vacant or contaminated property within Onondaga County. Since 2015, OCIDA has entered into 11 PILOT agreements which have a total project investment of over \$630,000,000, many of which have returned contaminated properties back into productive use.





November 16, 2017

United States Environmental Protection Agency  
Via [www.grants.gov](http://www.grants.gov)

RE: EPA FY18 Brownfields Cleanup Grant Cost Share & Ability to Leverage

Dear Ms. Granat,

The Onondaga County Industrial Development Agency (OCIDA) board is writing to express its commitment to support the USEPA FY18 Brownfield Cleanup Grant application to remediate the former Roth Steel Property at 800 Hiawatha Boulevard West in Syracuse, NY (the 'Site'), and to commit to the required 20% cost share (\$40,000) for remaining project expenses. OCIDA is currently entered into the NYSDEC Voluntary Cleanup Program and remains willing to work with NYSDEC and US EPA to complete remediation measures. OCIDA has contracted with JMT of New York, Inc. (formerly Spectra Environmental Group, Inc.) to complete the investigation and cleanup of the Roth Steel property.

OCIDA has committed to providing funds necessary to complete the Alternative #2 Remediation, described in the Analysis of Brownfield Cleanup Alternatives provided by JMT. This Alternative involves hot spot removal, disposal of hazardous and non-hazardous material, capping, and necessary deed restrictions. The major focus of grant funds will be to remove 2 automotive shredder residue (ASR) cells buried on the portion of the Site that is slated for passive recreational use via a Canalway trail. The estimated cost of Alternative #2 is \$478,000. If awarded, this grant will provide \$30,000 for a public outreach campaign to invest neighboring communities in the remediation of the Site and help direct cleanup, as well as \$170,000 for the hazardous soil excavation and disposal (approximately 800yd<sup>3</sup>, with footings, ASR disposal cell hot spots). A cost share for \$40,000 provided by OCIDA will go toward non-hazardous soil excavation and disposal (approximately 900 yd<sup>3</sup>, with footings). The remaining project costs (\$238,000) will be provided by OCIDA's general fund to complete Alternative #2.

Once cleanup is complete, OCIDA plans to use its resources of payments in lieu of tax (PILOT) to help make the property more attractive for developers or public entities with use that is safe for human health and safe for the environment. This project would benefit one of the poorest areas within our region, which is also one of the neediest areas in the country, through decreased exposure to harmful toxins, increased opportunity for safe bicycle and pedestrian access, and increased quality of life through increased green space.

Sincerely,

*Julie A. Curo, Executive Director*





November 16, 2017

Ms. Holly Granat  
Project Coordinator  
Onondaga County Office of Environment  
421 Montgomery Street, 14<sup>th</sup> Flr.  
Syracuse, NY 13202

Dear Ms. Granat:

The purpose of this letter is to support of the Onondaga County Industrial Development Agency's grant proposal to the U.S. Environmental Protection Agency under the Brownfields Assessment Grant. Administered by the Montezuma Audubon Center (MAC), the Onondaga Lake Conservation Corps (Corps) was established in 2012 as an organization of community volunteers inspiring future stewards of Onondaga Lake through hands-on, experienced-based programs that help restore and sustain this important natural resource. Charter members of the Corps include Audubon NY, MAC, Onondaga Audubon Society, Anchor QEA, Honeywell, OBG and Parsons. Recently, Bond Schoeneck & King, SUNY College of Environmental Science and Forestry and Habitat Gardening in CNY joined as community members. In 2015, the Corps proudly received the U.S. Environmental Protection Agency's (USEPA) Environmental Champion Award. This annual award recognizes those who have demonstrated an outstanding commitment to protecting and enhancing environmental quality and public health and is the highest recognition presented to the public by the agency.

Onondaga Lake became one of America's most polluted lakes due to past municipal and industrial practices. As a result of the efforts of local, state, and federal governments, the private sector, and other stakeholders, the contamination to Onondaga Lake is being addressed and the ecosystem is being restored. It has been a remarkable recovery. These efforts include critical natural habitat restoration and improvement to water quality, resulting in the Lake being a vital community asset and enhancing the quality of life for all residents. For these efforts to remain sustainable into the future, sustained engagement and participation of residents is required. Through our work in the community, the MAC identified vested public concern and interest in the Lake cleanup, and interest in public participation in its stewardship. The Corps was created to fill this need by providing local residents the opportunity to directly help restore and sustain the Lake.

To date, Corps volunteers have planted more than 6,000 native plants, trees and shrubs, removed over 8,000 pounds of invasive water chestnut plants, built and installed 24 bird boxes and hosted dozens of community outreach and environmental education events featuring birds and wildlife now thriving at Onondaga Lake. Corps volunteers span all ages, including retirees and families with children as young as five-years-old, participating in restoration and monitoring activities and nurturing a new generation of Onondaga Lake stewards.

2295 State Route 89, PO Box 187, Savannah, NY 13146 / 315-365-3588 / <http://www.lakecleanup.com>



The Corps is interested in partnering with the Onondaga County Industrial Development Agency for the grant period. The proposed project will involve new community partners, to engage the public and various stakeholder groups in this cleanup process to revitalize the former Roth Steel Property so that it is safe for productive use and public recreation. The Corps will work with Onondaga County to convene project update and planning meetings, lead educational field trips for Syracuse City and Onondaga County students, and coordinate Corps volunteers to assist with the habitat restoration and cleanup projects on the property. A green space on this property will help improve the quality of habitat at Onondaga Lake for the dozens of bird species that utilize this Important Bird Area, including many threatened species like the Bald Eagle, Pied-billed Grebe, and Northern Harrier.

Please consider funding the Onondaga County Industrial Development Agency's to help keep Onondaga Lake clean and healthy for birds, other wildlife and our community.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Chris Lajewski". The signature is written in a cursive, flowing style.

Chris Lajewski  
Program Director, Onondaga Lake Conservation Corps  
Center Director, Montezuma Audubon Center

# F · O · C · U · S

## GREATER SYRACUSE

October 24, 2017

Ms. Holly Granat  
Onondaga County Office of Environment  
John H. Mulroy Civic Center  
421 Montgomery Street 14th Floor  
Syracuse, NY 13202

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Re: FY18 BROWNFIELDS CLEANUP GRANTS

Dear Ms. Granat:

As the Executive Director of FOCUS Greater Syracuse I am pleased to provide this letter of support for OCIDA's application for funding under the United States Environmental Protection Agency's 2018 Brownfield Cleanup Grant program. Support from the EPA would provide Onondaga County with important funding support needed in order to meet the goals and needs established by our citizens in a studies we have completed that outlined how local residents would like to reconnect with and utilize Onondaga Lake.

In 2012 FOCUS completed a citizens report on what Onondaga County residents wanted to see on the shoreline of Onondaga Lake. The report was submitted to Onondaga County Executive Joanne Mahoney and widely distributed throughout the community. The basic recommendations were to keep the shoreline of the lake open to the public and complete the long planned "Loop the Lake" Trail for hiking and biking. The Roth Steel property is one of the remaining obstacles to completing the trail and achieving the goals established by the public. The planned cleanup for Roth is to remove two automotive shredder residue waste cells buried along the northern portion of the site and clean the portion of the site with the Loop the Lake trail to passive recreational standards.

### EMERITUS

William Brod  
Lucille Browning  
Michael LaFlair  
Andrea Latchem  
Andrew Maxwell  
Judith C. Mower  
George Puzey  
William Sanford  
Nancy H. Smith

This October, FOCUS will complete an update to our 2012 lake report. This new "Reconnecting Citizens to Onondaga Lake" report will further outline and establish the commitment our community has to utilizing and preserving the shoreline of Onondaga Lake. As mentioned above, funding from the EPA will directly go to meeting the priorities and needs established by ordinary citizens in regard to how the lake shoreline should be accessible and available to everyone in the community.

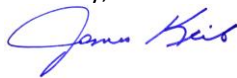
As a supporting agency, FOCUS will be responsible for leading the community outreach and informational efforts that the county has established for educating the public on the cleanup efforts for the Roth Site. During our public forums local residents will have the opportunity to comment on cleanup plans and will be able to voice their opinion on how this effort will meet the goals and expectations established by them as noted in our 2012 and 2017 reports.

We strongly support the OCIDA grant application to the EPA under the 2018 Brownfields Cleanup Grant program.

### STAFF

James Keib  
Dee Klees  
Frank Moses

Sincerely,



James Keib  
Executive Director

**F.O.C.U.S. Greater Syracuse, Inc.**

City Hall Commons • 201 E. Washington St. • Suite 704 • Syracuse, New York 13202  
315.448.8732 • 315.448.8733 (fax) • [focus@syr.gov](mailto:focus@syr.gov) • [www.focussyracuse.org](http://www.focussyracuse.org)



November 16, 2017

Holly Granat  
Project Coordinator  
Onondaga County Office of Environment  
421 Montgomery Street, 14<sup>th</sup> Floor  
Syracuse, NY 13202

Re: EPA Brownfield Cleanup Grant

Dear Ms. Granat,

I enthusiastically support OCIDA's application for the EPA Brownfields Cleanup Grant. OCIDA's plans to address the Roth Steel site on Hiawatha Blvd are critical to the overall vitality and health of our community. This site has the potential to be a wonderful community amenity – as well as a site for future economic development and job creation.

As the Vice President of Economic Inclusion at CenterState CEO, I oversee a portfolio of initiatives and projects, dedicated to creating opportunity and prosperity and improving quality of life for underrepresented communities throughout Central New York. Your efforts on this project are fully aligned with my efforts in the community as well. Among the initiatives within my portfolio is the Northside Urban Partnership (Northside UP), a collaborative of neighborhood leaders and stakeholders, developing and implementing strategies that improve quality of life within Northside neighborhoods. Should you wish to engage Northside stakeholders in your efforts related to this grant, we are more than willing to partner. Specifically, we are able to convene meetings for the purposes of planning and feedback.

I wish you the best of luck on your application.

Sincerely,

Dominic Robinson  
The CenterState Corporation for Economic Opportunity  
Vice President of Economic Inclusion  
Director of the **Northside Urban Partnership**

## Threshold Criteria for FY18 EPA Brownfields Cleanup Grant – FY18 Former Roth Steel Site

### **1. Applicant Eligibility**

Onondaga County Industrial Development Agency (OCIDA) is applicable for this EPA Brownfields Grant under the General Purpose Unit of Local Government definition under 2 CFR 200.64: Local government means a county, municipality, city, town, township, local public authority (including any public and Indian housing agency under the United States Housing Act of 1937), school district, special district, intrastate district, council of governments (whether or not incorporated as a nonprofit corporation under state law), any other regional or interstate government entity, or any agency or instrumentality of a local government. OCIDA is a local public authority of Onondaga County.

### **2. Site Ownership**

The Site is owned by the Onondaga County Industrial Development Agency, who purchased the Site October 27, 2015 from the bankruptcy trustee, William Leberman, Esq.

### **3. Basic Site Information**

The Site is a 24 acres located at 800 Hiawatha Boulevard West (former Roth Steel), Syracuse NY 13204 along the southern shore of Onondaga Lake in an urban area north of the intersection of Hiawatha Boulevard with State Fair Boulevard. The site is bounded by CSX Railroad tracks to the northwest; the Onondaga County Metropolitan Wastewater Treatment Plant to the north/northeast; Hiawatha Boulevard to the east/southeast; and several commercial businesses to the southwest on State Fair Boulevard. The site is currently vacant and is zoned as an industrial district. The surrounding parcels are currently used for a combination of commercial, light industrial and utility right-of-ways. The nearest residential area is 0.3 miles to the east. The Southside neighborhood is the nearest residential cluster to the southeast of the Roth Steel site. The current owner of the site is Onondaga County Industrial Development Agency (OCIDA).

### **4. Status and History of Contamination at the Site**

The former Roth Steel property is contaminated by both hazardous and petroleum wastes. The Roth Steel facility operated as a metal processing and recycling center from the 1950s up until 2014. Prior uses that appear to have led to site contamination include the storage and shredding of vehicles, white goods (Solvay Process waste), and other scrap materials; onsite disposal of automotive shredder residue (ASR)

in two underground cells; and unregulated discharges of stormwater. The site was previously investigated under a Consent Order between Roth Steel and NYSDEC. PCBs, VOCs, and heavy metals such as mercury and lead were present at the Site. Roth declared bankruptcy and closed the facility in 2014. Onondaga County Industrial Agency purchased the site from the bankruptcy trustee in 2015. The Site is located in an industrial and commercial area on the southern end of Onondaga Lake and is zoned as an industrial district. The Site is currently vacant.

### **5. Brownfields Site Definition**

OCIDA affirms that the former Roth Steel property is a brownfield as defined by: real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of hazardous substance pollutants, contaminants, controlled substances, petroleum or petroleum products, or is mine-scarred. This property is not listed or proposed for listing on the National Priorities, is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and not subject to the jurisdiction, custody, or control of the U.S. government.

## **6. Environmental Assessment Required for Cleanup Proposal**

JMT of New York, Inc. —formerly Spectra Environmental Group, Inc.—submitted (on behalf of OCIDA) an Interim Remedial Measures (IRM) Work Plan to NYSDEC that was approved on October 25, 2016. Since PCB-containing remediation waste is present on the Site, USEPA also has regulatory jurisdiction over the Site, therefore JMT also completed a Self-Implementing Cleanup and Disposal Notification Plan for 800 Hiawatha Boulevard West (Former Roth Steel Site) through the NYSDEC BCP Site C734083. This Plan is the equivalent of a written ASTM E1903-11 or Phase II site assessment report, and was approved by US EPA and NYS DEC on December 19, 2016. The Plan includes all appropriate sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures that were used to characterize the Site.

## **7. Enforcement or Other Actions**

OCIDA affirms that there are no past, current or future ongoing or anticipated environmental enforcement or other actions related to the brownfield site for which funding is sought.

## **8. Sites Requiring a Property Specific Determination**

OCIDA has attached the Property Specific Determination from the EPA below.

## **9. Site Eligibility and Property Ownership Eligibility**

### **a. Property Ownership Eligibility—Hazardous Substances Sites**

Onondaga County Industrial Development Agency is not liable for contamination under CERCLA Section 107 because they were not owner of the site at the time of disposal of hazardous substances, and did not arrange for, or contribute to, the disposal or treatment of hazardous substances on the site. All disposal of hazardous substances at the site occurred before OCIDA acquired the site. OCIDA is not liable in any way for contamination at the site or affiliated with a responsible part. OCIDA purchased the Site from the bankruptcy trustee on October 27, 2015. There are no relationships to prior owners.

Prior to the purchase of the site, OCIDA completed all appropriate inquiries (AAI) by conducting a Phase 1 environmental site assessment using the ASTM E1527-13 standard practice. OCIDA has selected JMT of New York, Inc. through an EPA-approved Request for Proposals process to complete a Remedial Investigation Work Plan and Interim Remedial Measure Work Plan including site inspections, reviews of historical sources, reviews of government records, consideration for the degree of contamination, and public comments. JMT also completed a Self-Implementing Cleanup and Disposal Notification Plan for the Site through the NYSDEC BCP Site C734083. This Plan is the equivalent of a written ASTM E1903-11 or Phase II site assessment report, and was approved by US EPA and NYS DEC on December 19, 2016. The Plan includes all appropriate sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures that were used to characterize the Site.

Post-acquisition, the property sat vacant. OCIDA has ensured the prevention of future releases and exposures to hazardous substances on the site, and plans to provide all legally required notices and cooperate with authorized response persons in the event of discovery or release of any hazardous substances at the site. OCIDA is prepared to comply with any land-use restrictions associated with response actions at the site.

OCIDA has contracted with JMT of New York Inc. to ensure that reasonable steps have been taken to stop any continuing releases, prevent any threatened future release; and prevent or limit exposure to any previously released hazardous substances. JMT has removed drums of potentially hazardous substances and contained areas of asbestos to be removed by qualified professionals from NYSDEC. High chain link fencing was put up surrounding the property to prevent or limit exposure to any hazardous

substances left on the property.

## **1. CERLA Section 107 Liability**

OCIDA affirms that it is not liable for contamination under CERCLA Section 107 and OCIDA is eligible for CERCLA liability protections/defenses as a bona fide prospective purchaser (BFPP). OCIDA reviewed an existing Phase I Environmental Assessment for the Site (dated April 2015) prior to purchasing the property on October 27, 2015. All contamination at the site is related to operations of the prior owner. OCIDA has not occupied the Site since it was purchased and have caused no additional contamination.

## **2. Information on Liability and Defenses/Protections**

### **a. Information on the Property Acquisition**

Roth Steel Corporation abandoned the property during bankruptcy and OCIDA purchased the property from the bankruptcy trustee, William Leberman, Esq., on October 27, 2015. OCIDA has sole ownership over the property. There are no familial, contractual, corporate, financial relationships or affiliations OCIDA has had with any prior owners or operators (or potentially responsible parties) of the property (including the person from which OCIDA acquired the property).

### **b. Timing and/or Contribution Toward Hazardous Substances Disposal**

All disposal of hazardous substances at the property occurred before OCIDA acquired the property, and OCIDA did not cause or contribute to any release of hazardous substances at the property before property acquisition. OCIDA also did not arrange for the disposal of hazardous substances at the property or transport hazardous substances to the property at any time.

### **c. Pre-Purchase Inquiry**

A Phase I Environmental Site Investigation of the property was performed by Plumley Engineering in April 2015 for Weitsman Syracuse Holdings, LLC, during which a history of site ownership was determined. OCIDA reviewed this Phase I ESI prior to purchase in addition to other environmental reports and DEC correspondences about the Site. The Site was used to disposed Solvay waste/fill prior to 1967 when purchased by the Roth Steel Corporation. Roth Steel operated a metal recycling facility at the property from 1967 to 2014. Various waste materials were buried at the site and exist in abandoned buildings. OCIDA contracted with JMT of New York Inc. to perform the Phase II investigation and complete an Interim Remedial Measure Work Plan.

### **d. Post-Acquisition Uses**

The property has not been used or occupied since its acquisition in October 2015. Timeline: 1967-2014 – Roth Steel Corporation used the Site as a metal recycling facility, abandoned the property during bankruptcy (no affiliation to OCIDA); 2014-11/27/15 – the Site was bank-owned and there was no designated Site use; 11/27/15-present – OCIDA purchased the property from the bankruptcy trustee; there are no current Site uses.

### **e. Continuing Obligations**

All liquid drums of known/unknown materials were inspected for integrity; and leaky drums were overpacked and stored on plastic sheeting in building #5 to prevent future waste releases. These waste materials have been inventoried and will be characterized by a certified laboratory to determine proper disposal methods. OCIDA has restricted Site access by securing buildings and putting up perimeter fencing around the entirety of the Site. Environmental sampling has been completed to further investigate potential contamination and remediation measures, and work has been approved by both NYSDEC and USEPA in October of 2016. The Site is currently within the NYSDEC Voluntary Brownfield Cleanup Program (Site C734083).

OCIDA confirms its commitment to:

- i. Comply with all land-use restrictions and institutional controls – None currently exist for the Site.
- ii. Assist and cooperate with those performing the cleanup and provide access to the property – OCIDA is the Site owner and is working closely with NYSDEC through contracted environmental firm JMT of New York to assess and remediate the Site through the NYS Voluntary Brownfield Cleanup Program.

- iii. Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property – None are known to exist. A public information repository and communication plan has been established for the Site.
- iv. Provide all legally required notices – Required notices are listed in detail within the NYSDEC approved Community Participation Plan for the Site. Included is a Site mailing list and notification to local media outlets.

#### **10. Cleanup Authority and Oversight Structure**

- a. The Site is currently under the oversight of the New York State Department of Environmental Conservation through the Voluntary Brownfield Cleanup Program. OCIDA has been working with its contracted environmental firm, JMT of New York Inc., to communicate with NYSDEC and USEPA to get all required approvals and ensure that the cleanup is protective of human health and the environment. JMT was acquired through an EPA-approved Request for Proposals process in 2016. Both NYSDEC and USEPA will certify the completion and satisfaction to which the Site is remediated through this program.
- b. Although access to adjacent properties is not anticipated, OCIDA will work with neighboring properties to install off-site migration monitors in the form of easements.

#### **11. Community Notification**

OCIDA announced a public hearing on Monday, October 23<sup>rd</sup>, 2017 to be held on October 30<sup>th</sup>, 2017 at 5:00pm at the Onondaga County Industrial Development Agency, 333 W. Washington Street, Suite 130 in Syracuse, NY 13202. The EPA FY18 Cleanup Grant Proposal and Analysis of Brownfield Cleanup Alternatives was available on the OCIDA website prior to the hearing, and the public was encouraged to submit comments, questions and concerns to [HollyGranat@ongov.net](mailto:HollyGranat@ongov.net), who is the point of contact on this grant. The posting was online, on the OCIDA website, which is used to announce every public meeting they have monthly. The posting was also placed in the Onondaga County courthouse, as are all OCIDA meeting announcements. The public had ample opportunity to provide comment. The notification and applicable documents are attached.

#### **12. Statutory Cost Share**

OCIDA has allocated \$40,000 of general funds via board approval to pay for a portion—approximately 22%—of the costs necessary to provide a 3-acre cover with 1 ft. of soil for the Site (remaining work from the Remediation Task Alternative #2 presented in the Analysis of Brownfield Cleanup Alternatives). The remaining costs to complete this project task are demonstrated as leveraged funds from OCIDA in 2.c.Ability to Leverage within the grant application. This Brownfield Cleanup Grant Award will fund approximately 42% of the total project cost (\$478,000) for the Roth Steel Alternative #2 Remediation (as referenced in the Analysis of Brownfield Cleanup Alternatives).



Name of Organization and Point of Contact: OCIDA; Isabelle Harris Phone Number: 315-435-3770 Email: IsabelleHarris@ongov.net	<b>Brownfields Property Approval</b> <b>EPA Region 2</b> <b>290 Broadway, 18th FL, New York, NY 10007</b>	<b>HAZARDOUS SUBSTANCES CONTAMINATION</b>
<b>I - Property Information</b>		
Name of Property: Former Roth Steel Brownfield Cleanup Site		
Address: 800 Hiawatha Boulevard West		
	City: Syracuse	
Zip Code: 13204		
Current Owner: Onondaga County Industrial Development Agency (OCIDA)		
<b>II - Status and History of Contamination</b>		
Type of Contamination (mark one) : Hazardous Substances: <input checked="" type="checkbox"/> Petroleum: <input type="checkbox"/>		
<b>If contamination is co-mingle (hazardous substances and petroleum) please mark hazardous substances.</b>		
Current Use of Property: <u>None; the property is vacant.</u>	Period of operation: <u>1967-2014</u>	Total Years of Operation: <u>47</u>
Describe Environmental Concerns (if known): <u>Prior investigations reveal contamination of soil and groundwater, primarily by metals and PCBs. Localized VOC contamination also exists. Contamination is attributed to previous site activities.</u>		
How the property became contaminated? (if known): <u>The property was contaminated due to improper waste management practices by Roth Steel Corporation's metal recycling facility. Automotive Shredder Residue (ASR), containing non-ferrous and non-metallic materials such as PCBs from automobiles, capacitors, and other scrap metal, was supposed to be temporarily stored in a covered building at the facility until sent offsite for disposal or further material recovery. This process was not always adhered to as ASR is distributed on the surface and buried in areas on the property. Although less prevalent, petroleum (BTEX) compounds have been detected in environmental samples on the property. Vehicles were supposed to be drained of all fluids (fuel, engine oil, transmission fluid, coolant) before they were brought to the facility for recycling, but any amount of fluid remaining may have been released during the shredding process. It should also be noted that prior to Roth Steel Corporation's ownership, Solvay waste was historically used as fill around Onondaga Lake. Solvay waste appears in boreholes around the site at between 8 and 12 ft. below ground surface.</u>		
Describe the nature and extent of contamination (to the extent possible): <u>Multiple environmental investigations have been conducted on the property since 1968. The primary contaminants are metals, PCBs, and to a lesser extent, BTEX compounds. Recent data (May 2016) show metals (mercury, iron, and sodium) and PCBs (Aroclor 1248 and 1254) in groundwater and surface water. Soil samples containing ASR waste exceed NYSDEC Restricted Commercial Soil Cleanup Objectives for metals (mercury, cadmium, chromium, copper, iron) and the Toxic Substances Control Act (TSCA) regulations for total PCBs (&gt; 50 mg/kg).</u>		
<b>III - Property Eligibility for Funding</b>		
Is the property listed or proposed to be listed on the National Priority List?      YES _____      NO <input checked="" type="checkbox"/>		
Is the property subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA      YES _____      NO <input checked="" type="checkbox"/>		
Is the property subject to the jurisdiction, custody, or control of the U.S. governmentt?      YES _____      NO <input checked="" type="checkbox"/>		
<b>IV - Property Ownership Eligibility</b>		
<b>IV. 1 - CERCLA § 107 Liability</b>		
Are you eligible for one of the following CERCLA liability protections or defenses: (1) an innocent landowner; (2) a bona fide prospective purchaser (BFPP), (3) a contiguous property owner; or (4) a local or state government entity that acquired the property involuntarily through bankruptcy, tax delinquency, or abandonment, or by exercising its power of eminent domain.		
YES <input checked="" type="checkbox"/> NO _____		

If the answer is YES, please explain why? OCIDA is eligible for CERCLA liability protections/defenses as a bona fide prospective purchaser (BFPP). [They reviewed an existing Phase I Environmental Site Assessment for the site \(dated April 2015\) prior to purchasing the property on October 27, 2015.](#) All contamination at the site is related to operations of the prior owner. OCIDA has not occupied the site since it was purchased and have caused no additional contamination.

**IV. 2 - Enforcement Actions**

**The information provided in this section will be verified. EPA Region 2 will conduct an independent review of information related to the organization's responsibility for the contamination at the property.**

Identify known ongoing or anticipated environmental enforcement actions related to the property. [None applicable.](#)

Describe any inquiries or orders from federal, state, or local government entities that you organization is aware of regarding the responsibility of any party (including your organization) for the contamination at the property. [There were prior consent orders between NYSDEC and the former owner \(Roth Steel\). The former owner filed for bankruptcy and the consent order is no longer active.](#)

**IV. 3 - Information on Liability and Defenses/Protections Where Organization Does NOT Own the Property**

**Complete this section ONLY if your organization DOES NOT own the property.**

Did your organization arrange for the disposal of hazardous substances at the property or transport hazardous substances to the property?

YES\_\_\_\_\_ NO \_\_\_\_\_

Did your organization cause or contribute to any releases of hazardous substances at the property ?

YES\_\_\_\_\_ NO \_\_\_\_\_

Describe your relationship with the owner and the owner’s role in the work to be performed.

How you will gain access to the property?

YES\_\_\_\_\_ NO \_\_\_\_\_

**IV. 4 - Information on Liability and Defenses/Protections Where Organization Owns the Site or Will Own the Site During the Performance of the Assessment Cooperative Agreement**

**Complete this section ONLY if your organization own the property to be assessed or will own the property at some point during the performance of the cooperative agreement.**

**IV. 4.1 Information on the Property Acquisition**

How you acquired or will acquire ownership (e.g., by negotiated purchase from a private individual, by purchase or transfer from another governmental unit, by foreclosure of real property taxes, by eminent domain, or other (describe))

[Roth Steel Corporation abandoned the property during bankruptcy; OCIDA purchased the property from a bankruptcy trustee.](#)

Indicate the date you acquired or will acquire the property

[October 27, 2015](#)

The name and identity of the party from whom you acquired or will acquire ownership (i.e., the transferor): [Bankruptcy court trustee, William Leberman, Esquire](#)

Describe all familial, contractual, corporate, or financial relationships or affiliations you have or had with all prior owners, operators, or transporters of the property (including the person or entity from which you acquired or will acquire the property).

[None](#)

**IV. 4.2 Timing and/or Contribution Toward Hazardous Substances Disposal**

Identify whether all disposal of hazardous substances at the property occurred before you acquired (or will acquire) the property: <a href="#">All disposal of hazardous substances at the property occurred before OCIDA acquired the property.</a>
Did you cause or contribute to any release of hazardous substances at the property before acquire the property? YES_____ NO___X_____
Did you, at any time, arrange for the disposal of hazardous substances at the property or transport hazardous substances to the property? YES_____ NO___X_____
<b>IV. 4.3 Pre-Purchase Inquiry</b>
Describe any inquiry by you or others into the previous ownership of the propey you acquired (or will acquire). <a href="#">A Phase I Environmental Site Investigation of the property was performed by Plumley Engineering in April 2015 for Weitsman Syracuse Holdings, LLC, during which a history of ownership was determined. OCIDA reviewed this Phase I ESA prior to purchase in addition to other environmental reports and NYSDEC correspondences about the site.</a>
Describe uses and environmental conditions of the property prior to taking ownership: <a href="#">The site was used to dispose of Solvay waste/fill prior to 1967 when purchased by the Roth Steel Corporation. Roth Steel operated a metal recycling facility at the property from 1967 to 2014. Various waste materials were buried at the site and exist in abandoned buildings.</a>
The name and identity of the party from whom you acquired or will acquire ownership (i.e., the transferor). <a href="#">William J. Leberman, Chapter 7 Bankruptcy Trustee for Roth Steel and El-Roh Corporations.</a>
Indicate any type of environmental site assessments (e.g., ASTM E1527-05 Phase I) performed at the property, the dates of each assessment, and the entity for which they were performed (state whether the assessment was performed specifically for you, or if not, the name of the party that had the assessment performed and that party's relationship to you). <a href="#">Oil Contamination Study (Faltyn, 1968) for Roth Steel Corporation (no affiliation); Residue Characterization Report (Baumgartner &amp; Associates, 1993) for Roth Steel (no affiliation); Phase II ESA (Passero Associates, 2007) for Roth Steel (no affiliation); Site Investigation Report (O'Brien and Gere, 2013) for Roth Steel (no affiliation); Phase I ESA (Plumley Engineering, 2015).</a>
Who performed the All Appropriate Inquiries investigation or Phase I environmental site assessment and identify his/her qualifications to perform such work.  <a href="#">Dale Vollmer and Jesse Plumley of Plumley Engineering performed a Phase I Environmental Site Assessment of the property in April 2015. Dale Vollmer is a Professional Engineer and Jesse Plumley is an Engineer-in-Training; each were qualified based on their education, training, and experience, and used the latest ASTM guidance.</a>
Was the original AAI investigation or Phase I environmental site assessment conducted more than 180 days prior to the date you acquired the property? YES_____ NO___X_____
Did you conduct the appropriate updates of the original assessment within 180 days prior to your acquisition of the property in order to take advantage of the bona fide prospective purchaser, innocent landowner, or contiguous property owner provision. <a href="#">Not applicable.</a> YES_____ NO _____
<b>IV. 4.4 Post-Acquisition Uses</b>
Describe all uses to which the property has been put since you acquired ownership (or the uses that you anticipate once you acquire the property) through the present, including any uses by persons or entities other than you: <a href="#">The property has not been used or occupied since its acquisition in October 2015.</a>
Provide a timeline with the names of all current and prior users during the time of your ownership; the dates of all uses; the details of each use, including the rights or other reason pursuant to which the use was claimed or taken (e.g., lease, license, trespass); and your relationship to the current and prior users. <a href="#">Roth Steel Corporation (1967-2014) used site for metal recycling facility, abandoned property during bankruptcy (no affiliation)</a> <a href="#">Bank-owned (2014-11/27/15), no site use</a> <a href="#">OCIDA (11/27/2015 - current) purchased the property from the bank; there are no current site uses</a>
<b>IV. 4.5 Continuing Obligations</b>

Describe in detail the specific appropriate care that you exercised (or if you have yet to acquire the property, that you will exercise upon acquiring the property) with respect to hazardous substances found at the site by taking reasonable steps to:

1. Stop any continuing releases;
2. Prevent any threatened future release; and
3. Prevent or limit exposure to any previously released hazardous substance.

All liquid drums of known/unknown materials were inspected for integrity; any leaky drums were overpacked and stored on plastic sheeting in building #5 to prevent future waste releases. These waste materials have been inventoried and will be characterized by a certified laboratory to determine proper disposal methods. OCIDA is currently evaluating options for restricting site access including securing buildings and fencing. An environmental sampling program has been initiated to further investigate potential contamination and remediation measures. The site is currently within the NYSDEC Brownfield Cleanup Program (site C734083).

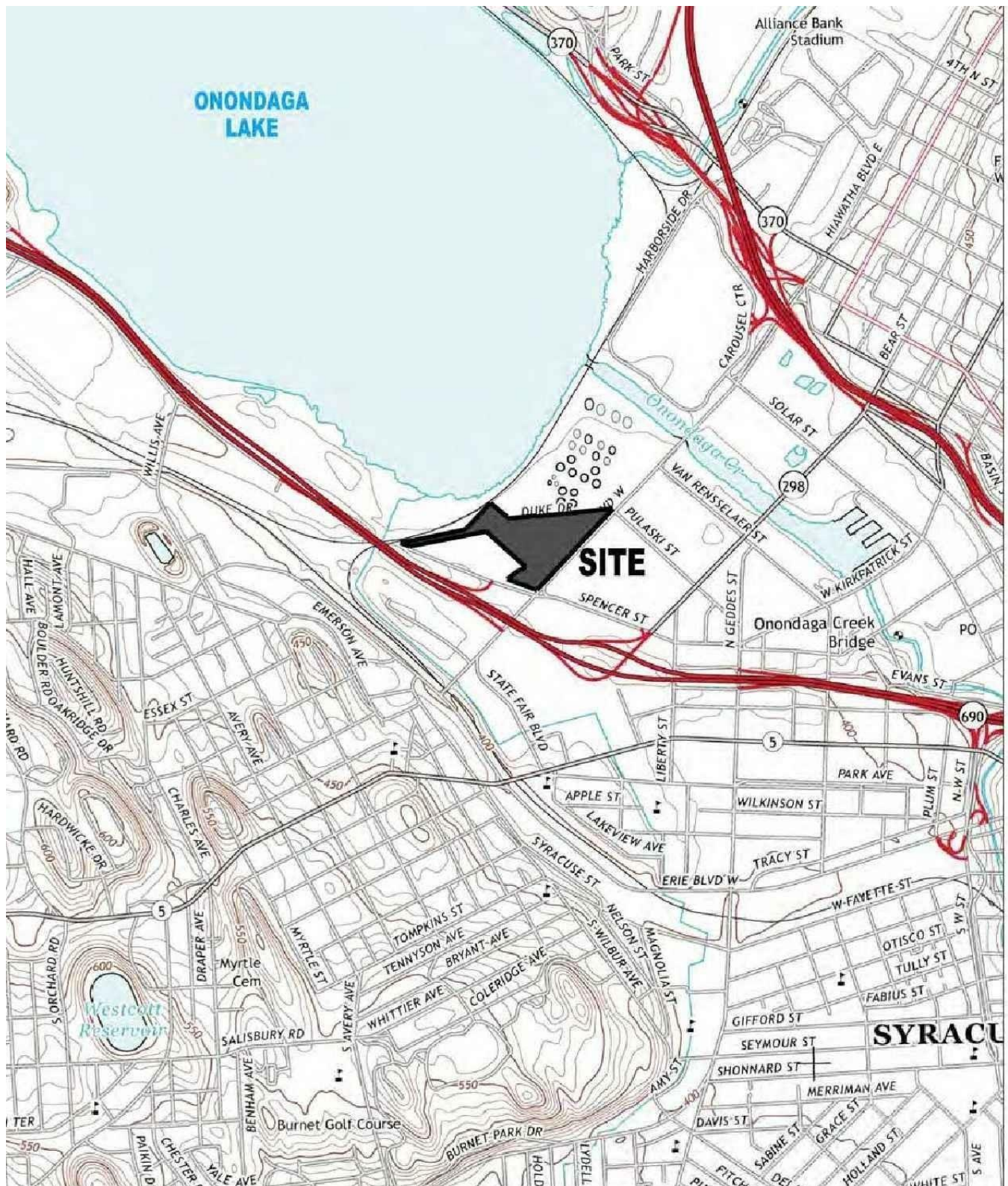
Describe in detail your commitment to:

1. Comply with all land-use restrictions and institutional controls - None currently exist for the site.
2. Assist and cooperate with those performing the assessment and provide access to the property - OCIDA is the site owner and is working closely with NYSDEC to assess and remediate the site.
3. Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property - None are known to exist. A public information repository and communication plan have been established for the site.
4. Provide all legally required notices - Required notices are listed in detail within the NYSDEC approved Community Participation Plan for the site. Included is a site mailing list and notifications to local media outlets.

## V - Property Location Map

Provide a property location map. The map should cover a radius of 2 miles.





REF.: USGS - SYRACUSE WEST (NY) QUAD., 2013



**SPECTRA**  
ENGINEERING, ARCHITECTURE, & SURVEYING, P.C.  
19 British American Blvd  
Latham, N.Y. 12110

Property Location Map  
**800 Hiawatha Boulevard Site**  
Syracuse, New York

CITY OF SYRACUSE

ONONDAGA CO., NY

PROJ. #:	16140	DATE:	6/15/16	SCALE:	NTS	DWG. NO.	16140A	FIGURE	1
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**Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation**  
**Former Roth Steel Property**  
**800 Hiawatha Boulevard West, Syracuse, NY 13204**

**Prepared by Onondaga County Office of Environment on behalf of Onondaga County Industrial  
Development Agency**

**I. Introduction and Background**  
**a. Site Location**

The site is located at 800 Hiawatha Boulevard West, Syracuse NY, 13204 (herein referred to as “the Site”).

***a.1 Forecasted Climate Conditions***

According the US Global Change Research Program (USGCRP), heat waves, heavy downpours, and sea level rise pose growing challenges to many aspects of life in the Northeast. Some of these factors, most specifically increased precipitation that may affect flood waters and stormwater runoff, are potentially applicable to the cleanup of the Site.

According to FEMA Flood Zone Map 36067C0216F, the Site is located within a Zone X of Onondaga Lake Watershed, where minimal flooding is expected. According to Onondaga County’s Hazard Mitigation Plan, the major waterbodies and tributaries within the Oswego River Basin in Onondaga County that experience frequent flooding include, but are not limited to, the Oswego River (of the Oswego River Watershed); Oneida Lake, Oneida River, Butternut Creek, Limestone Creek (of the Oneida River Watershed); and Onondaga Lake, Skaneateles Lake, Otisco Lake, Onondaga Creek, Nine Mile Creek, Ley Creek, Bloody Brook, Harbor Brook, Skaneateles Creek, Seneca River (of the Seneca River [Lower] Watershed). Greater storm frequency and intensity in a changing climate, combined with the fact that a large number of tributaries drain into the Oswego River Basin, may result in more frequent and more powerful flood waters within the Onondaga Lake Watershed, which may result in changes to the flood zone and increased risk of flooding to the Site.

Multiple areas on the Site, such as the former shredder and eddy sorter and former locations of two automotive shredder residue piles, accumulate precipitation and surface water runoff due to the fact they are topographically lower than other areas of the Site. Under current Site conditions, increased participation and extreme weather could result in additional accumulation of precipitation and Sit runoff. Site remediation and future re-development could mitigate runoff.

Based on the nature of the Site and its proposed reuse, changing temperature, rising sea levels, wildfires, changing dates of ground thaw/freezing, changing ecological zone, saltwater intrusions and changing groundwater table are not likely to significantly affect the Site.

***b. Previous Site Use(s) and any previous cleanup/remediation***

The Site, formerly known as Roth Steel Corps., is a 24-acre property located in an industrial and commercial area on the southern end of Onondaga Lake and is zoned as an industrial district. It operated as a metal processing and recycling center from the 1950s up until 2014. The Site stored and shredded

vehicles, as well as other scrap materials, and is underlain by Solvay process waste. These activities, the improper handling and disposal of Automotive Shredder Residue (ASR) onsite, and unregulated discharges of stormwater have contributed to contamination on the property. Multiple Site characterization investigations (summarized below) were completed between 1968 and 2013 under Roth Steel Corps. ownership. These historic and several more current investigations (summarized below) indicate that onsite pollutants include polychlorinated biphenyls (PCBs), volatile and semi-volatile organic compounds (VOCs and SVOCs), metals, glycols, cadmium and lead.

A Consent Order between Roth Steel and the New York Department of Environmental Conservation (NYSDEC) in 2013 led to the removal of 2,179 tons of ASR from the Site and its disposal at Seneca Meadows Landfill. Roth declared bankruptcy and closed the facility in 2014. No additional remediation is known to have been conducted under former ownership.

Onondaga County Industrial Development Agency (OCIDA) purchased the Site from the bankruptcy trustee in October 2015. Currently, the Site is entered into New York State's voluntary brownfield cleanup program and is tracked under State Tracking Number C734083. Since OCIDA's acquisition of the 24-acre property, several remediation efforts have been undertaken. Two massive Automotive Shredder Residue (ASR) piles, totaling 2,545 tons, from the Site and properly disposed at Ontario County and Seneca Meadows Landfills. Additionally, 56 drums of "auto waste" liquids were removed, including three classified as hazardous waste, 11 drums of drill cuttings, 7 rainwater drums, three 250-gallon totes of drilling fluid (one of which was hazardous waste), one drum of DECON water, one drum of mineral spirits, PCB capacitor materials mixed with asbestos waste, one drum of PPE, and one lab pack of aerosol cans/paints. Perimeter fencing has also been placed on the Site to secure it from the public.

### ***c. Site Assessment Findings***

Site characterization investigations that took place under previous ownership include the following (Refer to Figure 1 for study locations):

<b>Historic Study</b>	<b>Study Area(s)</b>	<b>Characterization Details &amp; Results</b>	<b>Remedial Action Taken</b>
Faltyn, 1968	Hand-drawing approximately indicates the ASR Disposal Cell area	Thirteen soil borings were completed with very limited chemical analysis of soil samples and a study of the peripheral drainage patterns. Indications of oil and tar were detected at some locations within the first three feet BGS with isolated pockets extending to depths of 6 to 7 ft. below ground surface (BGS).	None
Baumgartner & Associates, 1993	ASR Disposal Cells #1 and #2	The study determined that the ASR is buried 1 to 4 ft. below ground, ranges in thickness from 2 to 4 ft., and was	None

		estimated to be 6,300 cubic yards in volume in this area. Twenty-eight of thirty samples contained PCBs averaging 48.5 to 78 ppm in Cells #1 and #2, respectively. TCLP samples were tested for cadmium and lead at 29 locations. In addition, a full TCLP test was performed on one sample from each cell. No samples exceeded the TCLP limits.	
CME Associates, 2004	Parking Lot - exact boring locations are unknown as no map was included in the report	Nine soil borings were advanced to a depth of 6 ft. Boring logs indicate that the parking lot's subsurface contained fill deposits (silt, sand, gravel, slag, coal ash, glass, brick, ceramic, wire, and solvay waste) and a shallow water table, as high as 6 in. BGS. No environmental testing was performed.	None
Passero Associates, 2007	ASR Disposal Cells #1 and #2; material acceptance/processing/storage area to the south and east of the cells; pond/lagoon	Seventeen soil borings were installed to investigate to a depth of at least 8 ft. Several soil samples were also collected from the onsite lagoon. Results show that PCBs, and to a less extent, metals and SVOCs in certain soil samples were in excess of NYSDEC cleanup levels. Groundwater in some areas was observed to be impacted by PCBs and moderate levels of VOCs. It should be noted, however, that the groundwater samples were collected from open geoprobe holes rather than properly constructed monitoring wells, therefore, the analytical results may be biased high due to elevated turbidity in the samples. This is an ongoing issue NYSDEC is trying to address via the Tully Mudboils projects.	None
Brown & Caldwell, 2008 & 2009; AECOM, 2010; O'Brien & Gere, 2013	North and west of the ASR Disposal Cells #1 and #2; shredder; pond; former automobile storage area	Sixty-five soil borings and 17 monitoring wells were installed. Analytical results detected many different constituents across the Roth Steel Site including: gasoline related VOCs in groundwater;	None



		<p>xylene and toluene in soil; chrysene in soil; PCBs in soil; and metals in soil (cadmium, chromium, lead, mercury, manganese and zinc) and groundwater (aluminum, barium, iron, lead, magnesium, manganese, and sodium). For constituents with levels above the minimum health standards, they will need to be removed. All existing constituents will be capped with clean fill.</p>	
<u>NYSDEC Consent Order R7-20121101-89</u>	Northwest of the pond	Not applicable	The ASR pile (2,179 tons) was removed from the Site and taken to Seneca Meadows Landfill.
<u>O'Brien &amp; Gere, September 20, 2013</u>	Northwest of the pond, beneath the removed ASR pile	<p>Samples were collected on August 8, 2013 from eight locations. Post removal samples (0-4", 4-16") were analyzed for PCBs, arsenic, barium, cadmium, lead, and selenium. The analytical results indicated that elevated levels of PCBs and metals remained on Site. These elevations will need to be capped or removed, pending NYSDEC approval.</p>	None

Site characterization investigations that have taken place under current ownership include the following:

Current Study	Study Area(s)	Characterization Details & Results	Remedial Action Taken
<u>CHA, February &amp; May 2016</u>	Canalways Trail Extension area	<p>To date, this project has produced environmental data including a 200-ft. deep geotechnical boring, 13 shallow soil boring logs, and analytical data (VOCs, SVOCs, metals, and PCBs) from certain intervals of the shallow borings (1-2 samples per boring). Analytical results showed one</p>	N/A

		exceedance in SVOCs (benzo-a-pyrene) and several metals (arsenic, barium, cadmium, lead, barium, and/or mercury) exceedances.	
<u>Spectra, May &amp; June 2016, respectively</u>	ASR Disposal Cells #1 and #2	<p>Fourteen soil borings were drilled to better define the cell boundaries and 85 soil samples were collected to characterize the concentration of PCBs in this area. In addition, waste-material samples (ASR piles, drums) and limited groundwater (3) and surface water (3) samples were also collected.</p> <p>PCB concentrations exceeded 50 ppm in 3 out of 85 soil samples. Groundwater was sampled for VOCs, SVOCs, PCBs, metals, and glycols. Results indicated exceedances in iron, mercury, and/or sodium. Surface water was analyzed for VOCs, SVOCs, PCBs, and metals. Results included detections in PCBs (&gt;0.1 µg/L) and iron (&gt;300 µg/L). This soil will need to be capped or removed, based on the future use of the Site.</p>	N/A

#### ***d. Project Goal***

Although a future Site use has not been established, it is likely that the Site will have an ultimate commercial and industrial end-use. Commercial end-use may occur along the portion of the Site that borders West Hiawatha Boulevard. The proposed trail that crosses the northern edge of the Site would be considered “passive” recreation, which is equivalent to commercial use with New York State’s remedial program. The central portion of the Site may be used for disposal of dredged sediment, which would constitute an “industrial” use. The central portion of the Site will then act as a dewatering station for the sediment, which can later be sold as clean fill to other sites. Since the Site has a few different defined end-uses, the cleanup will ensure the trail portion of the Site is fit for passive recreation purposes. That is the focus of this project and this grant proposal.

## **II. Applicable Regulations and Cleanup Standards**

### ***a. Cleanup Oversight Responsibility***

The cleanup will be overseen by the New York State Department of Environmental Conservation and New York State Department of Health. In addition, all documents prepared for this Site are submitted to NYSDEC under State Tracking Number C734083. PCB-related matters are also subject to EPA (TSCA) review and approval.

### ***b. Cleanup Standards for major contaminants***

Some portions of the Site, including the Canalways Trail Extension and frontage along Hiawatha Boulevard West, will be remediated to commercial-use soil cleanup objectives. As currently planned, the central portion of the Site, will be remediated to industrial-use soil cleanup objectives. Overall, the selected remedy for the Site is under Track 4 Cleanup which includes restricted use with site-specific soil cleanup objectives, where the shallow exposed soils must meet the generic SCOs based on intended land use. There will be institutional controls in place, such as environmental easements and deed restrictions.

### ***c. Laws & Regulations Applicable to the Cleanup***

Laws and regulations that are applicable to this cleanup include:

NYSDEC 6 NYCRR Part 375 – BCP Remediation Sites;  
USEPA Toxic Substances Control Act (TSCA) Title 40 of the Code of Federal Regulations Part 761 (PCB cleanup & disposal); and  
City of Syracuse: General Code, Compliance & Zoning.

## **II. Cleanup Alternatives**

### ***a. Cleanup Alternatives Considered***

A portion of the Site is planned to contain the Canalways Trail. It will cross a linear strip of land, approximately 10 acres, on the Site that borders the Metro Plant. For the most part, the planned Canalways Trail will be constructed at ground level. However, for a linear distance of about 300 ft., the trail will gradually rise from ground level as it becomes elevated along a pedestrian bridge. The trail will rise to approximately 25 to 30 ft. above ASR Disposal Cells 1 and 2. The majority of the pedestrian bridge crosses over Disposal Cell 1.

To address contamination at the Site where the proposed Canalways Trail Project is planned, three different alternatives were considered, including Alternative #1: No Action, Alternative #2: Hot Spot Removal and Capping, and Alternative #3: More Widespread Excavation and Capping.

### ***b. Evaluation of Cleanup Alternatives***

In evaluating potential remedial options, consideration was given as to whether future use of the trail would be considered a “low-occupancy” or “high-occupancy” activity, as defined in 40 CFR 761.3. To assess future contaminant exposure potential to a trail user, anticipated exposure was evaluated considering the length of the trail and a typical walking rate. The portion of the planned trail that is at grade and directly overlying remediation waste is approximately 1100 ft. long. Assuming a conservative walking rate of 2 miles per hour, it would take about 6.25 minutes to walk across the at-grade portion of the trail. For an area to be considered “low-occupancy”, there must be less than 335 hours of annual exposure over PCB remediation waste for any individual not wearing dermal and respiratory protection. At a walking rate of 2 miles per hour, an individual would need to cross the at – grade portion of the trail 3,216 times in a calendar year to reach the 335-hour threshold. Considering the seasonal weather conditions in Syracuse, it is reasonable to assume that trail walking would occur primarily during the warmer months (excluding 3 winter months). During a 9-month period (270 days), an individual would need to cross the at-grade portion of the trail approximately 12 times per day to reach the threshold of 335 hours. Since it is highly unlikely that an

individual will use the trail this frequently, usage on this portion of the Site would constitute a “low-occupancy” activity. EPA’s PCB cleanup level for a “low-occupancy” use is 25 ppm. NYSDEC also provides PCB cleanup levels, depending upon future use. For a commercial or “passive” recreational use (e.g. trail) surface soils in the top 1 ft. cannot exceed 1 ppm. DEC guidance (CP-51) establishes a recommended PCB cleanup level of 10 ppm for subsurface (deeper than 1 ft.) soils.

The effectiveness, implementability, and cost of each alternative was considered in the selection of a recommended cleanup alternative.

#### Alternative #1: No Action

Previous investigations reveal PCB and metals (arsenic, lead, mercury, barium, cadmium, copper, and iron) contamination in portions of the Site where the Canalways Trail will be positioned.

If no remedial actions were taken, workers constructing the Trailway and trail walkers would potentially be exposed to elevated soil concentrations. The No Action Alternative is not an effective cleanup option for protection of public health.

Alternative #1 would be easy to implement since no actions are proposed.

The cost of Alternative #1 is minimal. There would be no expenditures for excavation, disposal, or capping. Environmental engineering assessment and risk assessment to present this alternative is estimated at approximately \$25,000.

#### Alternative #2: Hot Spot Removal, Disposal, Capping, and Deed Restrictions

Alternative #2 activities will protect workers and trail users from exposure to Site contaminants mentioned in Alternative #1 by removing soil hot spots, capping other areas, and using deed restrictions and fencing to restrict Site use.

In order to reduce the potential health risks to workers constructing the Trailway, Alternative #2 proposes to complete hot spot removal and/or provide 1-foot of approved soil as a cap along the Trail in the elevated portion of the Trail where it rises over the ASR Disposal Cells. The installation of bridge footings will be necessary for portions of the Trail. Therefore, workers would be directly exposed to contaminated soil. In order to prevent direct exposure, an approved plan has been developed to excavate around each designed bridge footing prior to the start of construction. Utility corridors will be established for trail lighting. Removed material will be categorized as hazardous waste if PCBs are 50 ppm or greater and will be taken to a hazardous waste landfill. PCBs less than 50 ppm will be taken to a non-hazardous waste landfill.

The “at grade” portion of the trail will be constructed with a 10-ft. wide asphalt surface. Consistent with 6 NYCRR Part 375-3.8, an asphalt surface will satisfy the NYSDEC capping requirements for a Track 4 restricted commercial-use remedy. A new fence will also be installed at the southern and western edges of the trail. This fence will restrict access between trail and other portions of the Site. Additionally, a chain-link fence already exists on the north edge of the trail separating the former Roth Steel Site from the Onondaga County Municipal Waste Water Treatment Plant. The area between the asphalt walking trail and the fence-lines, will have a 1 ft. compacted soil cover to prevent potential pedestrian exposure. This proposed remedy, along with deed restrictions (that will be established), is consistent with a NYSDEC Track 4

commercial-use (“passive” recreational) cleanup. It also satisfies the USEPA Self-Implementing PCB cleanup requirements for a low occupancy area. USEPA and NYSDEC have approved of this remedy.

An additional component for the remedy that has not yet been approved by DEC/EPA addresses the elevated section of the trail that crosses over the ASR Disposal Cells. A potential remedy for this area includes “hot spot” removal where PCBs are 50 ppm or greater followed by a 1 ft. soil cover over both ASR Disposal Cells. The excavated soils will be disposed of as hazardous waste at an offsite landfill. This cleanup plan would require future approval by NYSDEC and USEPA.

The estimated cost of Alternative #2 is \$478,000 (see cost breakdown below).

Remediation Task	Cost
3-acre cover (1 ft. of soil)	\$180,000
Hazardous soil excavation and disposal (~800 yd <sup>3</sup> , footings, ASR disposal cell hot spots)	\$170,000
Fencing	\$ 8,000
Sampling, engineering, and monitoring	\$ 75,000
Non-hazardous soil excavation and disposal (~900 yd <sup>3</sup> , footings)	\$ 45,000
Total Estimated Cost	\$478,000

#### Alternative #3: More Widespread Excavation and Capping

A third remedial option (Alternative #3) for the Site is to excavate elevated metal areas along portions of the Trailway area, dispose of the material offsite, place a demarcation layer and apply 1-ft. of approved soil cover. Although Alternative #3 activities will protect workers and trail users from exposure to Site contaminants, it will offer no more additional protection than Alternative #2 and would be performed at a much higher cost.

Implementing Alternative #3 is moderately difficult to implement as it requires more extensive excavation, increased potential for dust generation, and offsite contaminant migration. The increased soil removal will also consume more landfill space, which is a valuable commodity. Increased truck traffic and exhaust fumes also create an additional nuisance to the surrounding community. This alternative provides only a minimal (if any) increase of public safety for future trail users, while creating additional negative aspects during construction.

The estimated cost of Alternative #3 is \$968,000 (see cost breakdown below).

Remediation Task	Cost
3-acre cover (1 ft. of soil)	\$180,000
Hazardous soil excavation and disposal (~800 yd <sup>3</sup> , footings)	\$170,000
Fencing	\$ 8,000
Sampling, engineering, and monitoring	\$100,000
Excavate and dispose of elevated metals to 1 ft. depth along trail (1100 yd <sup>3</sup> )	\$ 80,000
Additional excavation of 10 ppm PCB soils in Disposal Cells (5000 yd <sup>3</sup> )	\$430,000
Total Estimated Cost	\$968,000

***c. Recommended Cleanup Alternative***

The recommended cleanup alternative is Alternative #2 (Hot Spot Removal, Disposal, Capping, and Deed Restrictions). Alternative #1 (No Action) cannot be recommended since it does not address potential exposure risks for the intended site use. Alternative #3 (More Extensive Excavation, Disposal, and Capping) offers no significant protection from Site contaminants than Alternative #2, requires greater costs, is more difficult to implement, and has other negative environmental impacts (increased dust, truck traffic/exhaust fumes, and consumes landfill space).

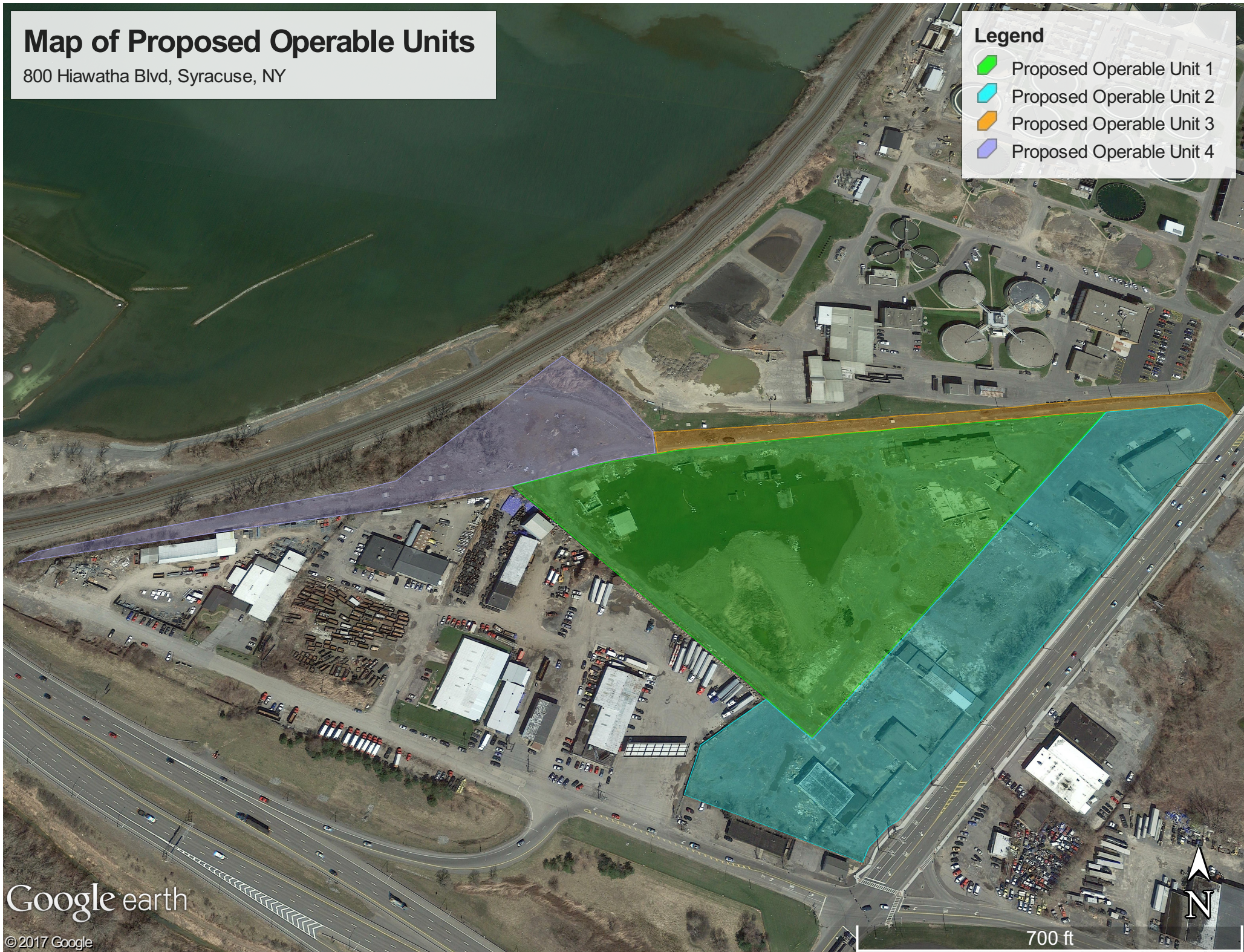


# Map of Proposed Operable Units

800 Hiawatha Blvd, Syracuse, NY

## Legend

- Proposed Operable Unit 1
- Proposed Operable Unit 2
- Proposed Operable Unit 3
- Proposed Operable Unit 4

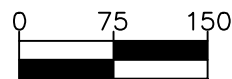






## LEGEND

- — — Approximate Property Boundary
- — — Proposed Operable Unit Boundary
- Automobile Shredder Residue (ASR) Pile
- — — Elevated Portion of Walking Trail (Proposed)
- — — Ground Level Portion of Walking Trail (Proposed)
- Clough Harbor & Associates Sample Locations (SB 1 – SB 13)



**SPECTRA**  
ENGINEERING, ARCHITECTURE, & SURVEYING, P.C.  
19 British American Blvd  
Latham, N.Y. 12110

Aerial Site Map  
**800 Hiawatha Blvd**  
Syracuse, New York

CITY OF SYRACUSE

ONONDAGA CO., NY

PROJ. No.: 16140 | DATE: 7/19/16 | SCALE: 1"=150' | DWG. NO. 16140B | FIGURE 2



# Meetings

2017

Meeting Name	Meeting Date	Notice	Agenda	Minutes
January 2017	Jan 10, 2017			
February 2017	Feb 7, 2017			
February 2017 - Annual	Feb 7, 2017			
March 2017	Mar 7, 2017			
March 2017 - Audit	Mar 7, 2017			
April 2017	Apr 11, 2017			
May 2017	May 9, 2017			
June 2017	Jun 6, 2017			
July 2017 Rescheduled	Jun 28, 2017			
July 2017 - Governance	Jun 28, 2017			
July 2017 - Finance	Jun 28, 2017			
August - No Scheduled Meeting	Aug 1, 2017			
August 2017 - Special	Aug 2, 2017			
August 2017 - Governance	Aug 2, 2017			
September 2017	Sep 12, 2017			
October 2017 - Finance	Oct 2, 2017			
October 2017 - Rescheduled	Oct 2, 2017			
October 2017 - Special	Oct 19, 2017			
Public Hearing Meeting - Brownfield Cleanup Grant Former Roth Steel Site	Oct 30, 2017			
November 2017	Nov 7, 2017			



**Notice of Public Hearing on  
the Proposed FY2018 EPA  
Brownfield Cleanup Grant:  
Former Roth Steel Property, 800  
Hiawatha Boulevard West, Syracuse,  
NY 13204**

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The proposed grant application and Analysis of Brownfield Cleanup Alternatives (ABCA) have been prepared for the Onondaga County Industrial Development Agency by the Onondaga County Office of Environment. The public is encouraged to submit comments and questions on this application and analysis of cleanup alternatives to provide additional advice to the Office of Environment on how to strengthen the grant application. Please see the document links below and submit any questions, comments, or concerns to [HollyGranat@ongov.net](mailto:HollyGranat@ongov.net).

A public hearing will be held for the purpose of discussing answers to these comments, and obtaining public advice on the Proposed EPA Brownfield Cleanup Grant for FY 2018. The presentation will include a brief overview of the purpose of the application, the goals of cleanup, and ways the public will be able to participate throughout the cleanup process.

The official public hearing will be held:

Monday, October 30<sup>th</sup>, 2017 at 5:00 p.m. at the Onondaga County Industrial Development Agency, 333 W. Washington Street, Suite 130, Syracuse, NY 13202

Interested persons and representatives of local governments and organizations are invited to present their reviews and comments in writing, or in person, at these hearings. Oral comments should be limited to five (5) minutes). Written statements of any length also may be mailed to Holly Granat, Environmental Policy Analyst, Onondaga County Office of Environment, 421 Montgomery Street, 14<sup>th</sup> Floor, Syracuse, NY 13202.

The Cleanup Application is available here: <https://www.ongoved.com/ocida/meetings/>

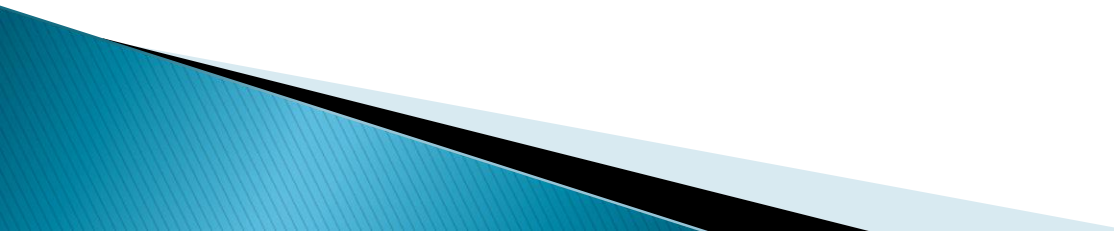
The Analysis of Brownfield Cleanup Alternatives is available here:  
<https://www.ongoved.com/ocida/meetings/>



# **EPA FY18 Brownfield Cleanup Grant Proposal**

Former Roth Steel Property  
800 Hiawatha Blvd. West, Syracuse, NY 13204

# Description of Grant

- ▶ Cleanup grants provide funding to carry out cleanup activities on brownfield sites owned by the applicant.
  - ▶ \$200,000 per proposal.
  - ▶ Hazardous substances and/or petroleum.
- 



# Why Roth?

**BANKRUPT**





# Site Goals

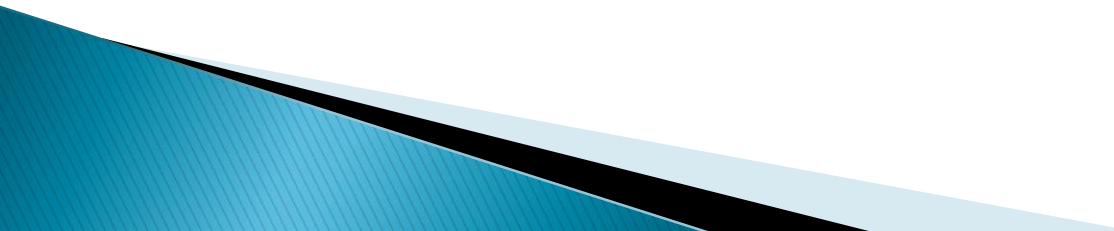


# Opportunities for Public Outreach

- ▶ Future use/redevelopment needs
- ▶ Monthly updates with local outreach organizations
  - FOCUS Greater Syracuse
  - Onondaga Lake Conservation Corps
  - Northside Urban Partnership



# Cleanup Grant Goal

- ▶ \$170,000 for the removal of ~800 yd<sup>3</sup> of hazardous soil, installation of bridge footings which are necessary for portions of the trail and ASR disposal cell hot spot removal.
  - ▶ \$30,000 Community Participation Plan with supporting organizations FOCUS Greater Syracuse, Northside Urban Partnership, and Onondaga Lake Conservation Corps.
- 

# Due: November 16th

- ▶ Questions?
- ▶ Comments?
- ▶ Concerns?

Thank You! 😊



NOTICE OF PUBLIC HEARING  
ON THE PROPOSED FY 2018 EPA BROWNFIELD CLEANUP GRANT AND ANALYSIS  
OF BROWNFIELD CLEANUP ALTERNATIVES  
October 30, 2017

The Public Hearing of the Onondaga County Industrial Development Agency, held on this day, Monday, October 30, 2017 at the first floor Conference Room, at 333 West Washington Street, Syracuse, New York was called to order at 5:01 pm by Holly Granat.

ATTENDEES:

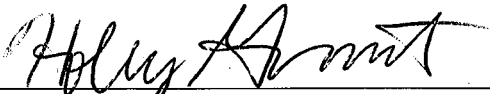
Holly Granat  
Travis Glazier  
Isabelle Harris  
Karen Doster

The Public Hearing was conducted regarding the application and project described as follows:

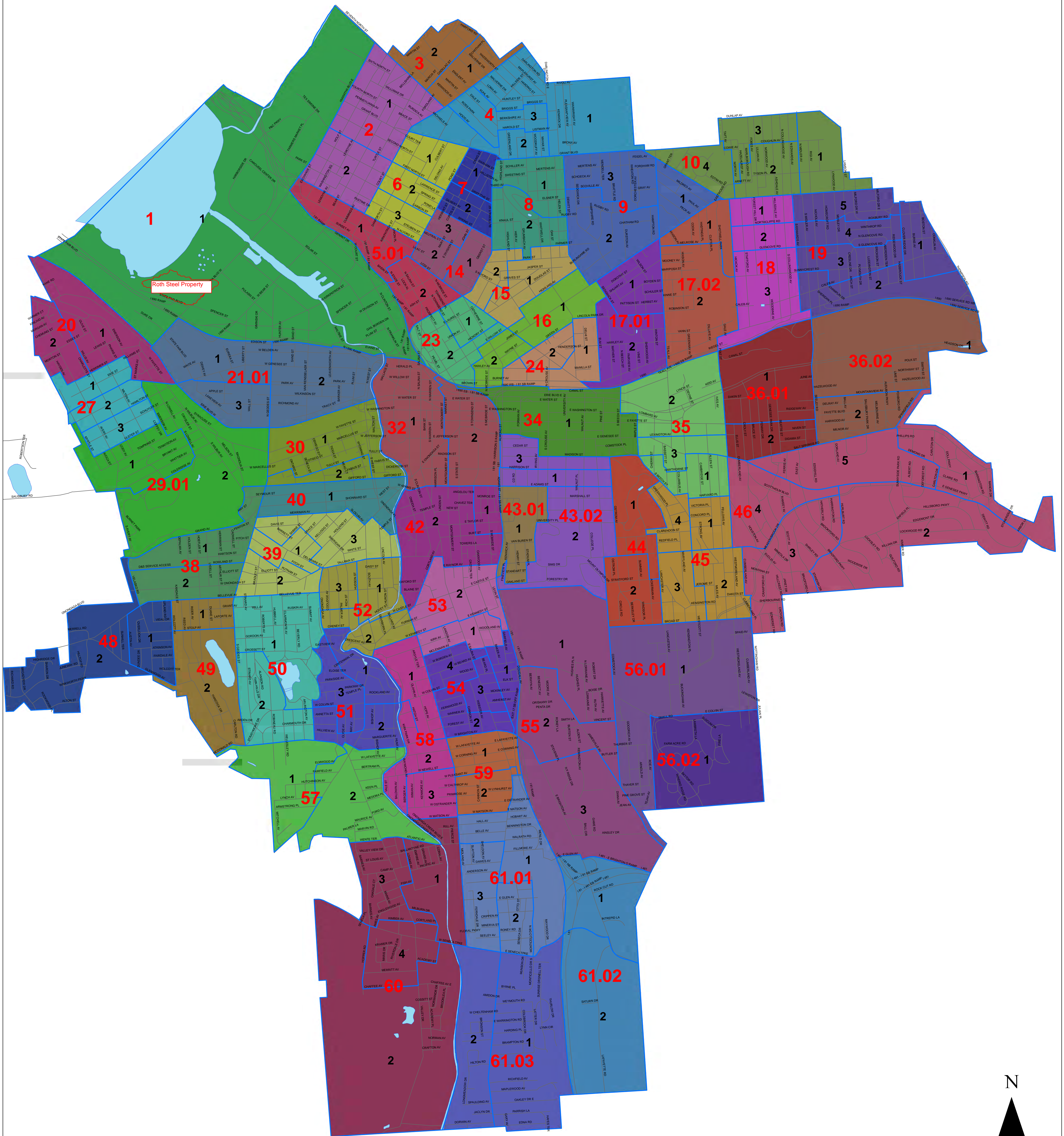
The proposed grant application and Analysis of Brownfield Cleanup Alternatives (ABCA) have been prepared for the Onondaga County Industrial Development Agency by the Onondaga County Office of Environment. A public hearing will be held for the purpose of discussing answers to these comments, and obtaining public advice on the Proposed EPA Brownfield Cleanup Grant for FY 2018 and preliminary evaluations on former Roth Steel Property at 800 Hiawatha Boulevard West, Syracuse, New York 13204.

There were no comments.

Holly Grant closed the public hearing at 5:06

  
\_\_\_\_\_  
Holly Granat, Office of the Environment





Department of Neighborhood  
& Business Development

# City of Syracuse 2010 Census Tracts



## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

11/16/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

\* a. Legal Name: Onondaga County Industrial Development Agency

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

161093714

\* c. Organizational DUNS:

0795770210000

d. Address:

\* Street1:

333 W. Washington Street

Street2:

\* City:

Syracuse

County/Parish:

Onondaga County

\* State:

NY: New York

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

13202-6103

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

\* First Name:

Holly

Middle Name:

\* Last Name:

Granat

Suffix:

Title: Environmental Policy Analyst

Organizational Affiliation:

Onondaga County Office of Environment

\* Telephone Number:

315-435-8497

Fax Number:

\* Email: HollyGranat@ongov.net

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-09

\* Title:

FY18 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

1238-2010SyracuseCensusTracts\_RothMarked.pdf

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Application for US EPA FY18 Brownfield Cleanup Grant for the Former Roth Steel Property, 800 Hiawatha Blvd. West.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="40,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="240,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: